IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA

FIRST APPELLATE DISTRICT

DIVISION FOUR

CHURCH OF SCIENTOLOGY, INTERNATIONAL,
Plaintiff/Respondent,

vs.

GERALD ARMSTRONG,
Defendant/Appellant.

NO. A075027

CLERK'S TRANSCRIPT ON APPEAL

FROM A JUDGMENT MADE AND ENTERED

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

MARIN COUNTY COURTS

VOLUME 21

For the Plaintiff/Respondent:

Andrew Wilson, Esq.
WILSON, RYAN & CAMPILONGO
115 Sansome Street, 4th Floor
San Francisco, CA 94104

For the Defendant/Appellant (In Pro Per):

Gerald Armstrong
715 Sir Francis Drake Blvd.
San Anselmo, CA 94960

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

MARIN COUNTY COURTS

DEPARTMENT 1

CHURCH OF SCIENTOLOGY, INTERNATIONAL,)
Plaintiff,)
)
vs.)
)
GERALD ARMSTRONG,) No. 157680
Defendant.)
)

GARY W. THOMAS	JUDGE
JOHN P. MONTGOMERY	COURT EXECUTIVE OFFICER
ELAINE PASSARIS	REPORTER

For the Plaintiff:

Andrew Wilson, Esq.
WILSON, RYAN & CAMPILONGO
115 Sansome Street, 4th Floor
San Francisco, CA 94104

For the Defendant (In Pro Per):

Gerald Armstrong
715 Sir Francis Drake Blvd.
San Anselmo, CA 94960

CHRONOLOGICAL INDEX NO. 157680 VOL. 21 MARIN NO. 157680	PAGE NO.
EX PARTE APPLICATION TO CONTINUE HEARINGS ON MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH AND 19TH CAUSES OF ACTION OF 2ND AMENDED COMPLAINT 3/29/95	5662
SUPERIOR COURT MINUTES OF 3/31/95: MOTION FOR SUMMARY ADJUDICATION OF THE TWENTIETH CAUSE OF ACTION OF PLAINTIFF'S COMPLAINT	5669
DECLARATION OF LAWRENCE WOLLERSHEIM IN OPPOSITION TO MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT 4/10/95	5670
DECLARATION OF LAURIE J. BARTILSON IN SUPPORT OF PLAINTIFF'S REPLY TO ARMSTRONG'S OPPOSITION TO PLAINTIFF'S MOTION FOR SUMMARY ADJUDICATION OF THE TWENTIETH CAUSE OF ACTIO OF PLAINTIFF'S COMPLAINT AND MOTION FOR SJMMARY ADJUDICATION OF THE THIRTEENTH, SIXTEENTH, SEVENTEENTH AND NINETEENTH CAUSES OF ACTION OF PLAINTIFF'S COMPLAINT 4/14/95	5835
PLAINTIFF'S COMBINED REPLY IN SUPPORT OF MOTION FOR SUMMARY ADJUDICATION OF THE TWENTIETH CAUSE OF ACTION OF PLAINTIFF'S COMPLAINT AND MOTION FOR SUMMARY ADJUDICATION OF THE THIRTEENTH, SIXTEENTH, SEVENTEENTH AND NINETEENTH CAUSES OF ACTION OF PLAINTIFF'S COMPLAINT 4/14/95	5840
GERALD ARMSTRONG'S NOTICE OF FILING CHAPTER 7 BANKRUPTCY PETITION AND IMPOSITION OF AUTOMATIC STAY 4/19/95	5850
SUPERIOR COURT MINUTES OF 4/21/95: MOTION FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION ; AND 13TH, 16TH, 17TH, & 19TH CAUSES OF ACTION OF 2ND AMENDED COMPLAINT	5853
SUPERIOR COURT MINUTES OF 4/28/95: MOTION FOR TERMINATIING OR EVIDENTIARY SANCTIONS AGAINST DEFT. GERALD ARMSTRONG	5854
SUPERIOR COURT MINUTES OF 8/3/95: STATUS/ADR CONFERENCE	5855
SUBSTITUTION OF ATTORNEY 9/15/95	5856
ARMSTRONG'S EX PARTE APPLICATION FOR ORDER ALLOWING FILING OF OPPOSITION TO MOTION FOR SUMMARY JUDGMENT/ADJUDICATION; DECLARATION OF FORD GREENE; ORDER 9/15/95	5859
ORDER 9/15/95	5869
EVIDENCE IN SUPPORT OF OPPOSITION TO MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT VOLUME I (INCLUDING EXHIBIT A) 9/18/95	5871

ORIGINAL

FILED

MAR 29 1995

5662

HOWARD HANSON
MARIN COUNTY CLERK
By M. Luton Deputy

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, California 94960
Telephone: 415-456-8450

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive,

Defendants.

No. 157 680

EX PARTE APPLICATION TO CONTINUE HEARINGS ON MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF 2ND AMENDED COMPLAINT

Date: 3/29/95
Time: 9:00 a.m.
Dept: One
Trial Date: 5/18/95

TO: CHURCH OF SCIENTOLOGY INTERNATIONAL AND ITS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on March 29, 1995 at 9:00 a.m., in Department 1 of the above-entitled Court, located at the Hall of Justice at the Marin County Civic Center, San Rafael, California, defendant Gerald Armstrong, in pro per, will seek an ex parte order continuing the hearing on plaintiff's motion for summary adjudication of the twentieth cause of action of its complaint presently set for April 14, 1995.

This ex parte application is based upon the grounds that defendant has been incapacitated by psychic trauma the past two weeks; that Scientology's motion for summary adjudication seeks an order which is very overreaching and if granted will cripple defendant and destroy his litigant's and human rights; that the motion concerns more than twenty people or entities from whom defendant must obtain declarations in support of his opposition; that the motion and supporting papers are over six inches of documents and concern matters over a twenty-five year period of defendant's life; that defendant is not an attorney and not represented by an attorney; that defendant has no monetary resources; that an extension of time will give defendant an opportunity to obtain an attorney, and give any attorney retained an opportunity to participate in this very important summary adjudication motion which will set the stage and parameters at trial.

This ex parte application is based upon this notice, the attached declaration of Gerald Armstrong, the Court's files and records in this case and such other material as is presented in support of this application.

DATED: March 28, 1995

By: ______________________
Gerald Armstrong

DECLARATION OF GERALD ARMSTRONG

I, Gerald Armstrong, declare:

1. I am the defendant in this case. I am not an attorney, not trained as an attorney, and do not have an attorney's knowledge or skills. Until February 23, 1995 I was represented by attorney Ford Greene.

2. On February 27, 1995 I received from plaintiff Scientology organization its motion for summary adjudication of its twentieth cause of action of its complaint. Scientology seeks a permanent injunction which is overreaching and if granted would hopelessly cripple me as a litigant, and destroy my civil and human rights.

3. On March 10 this Court signed an order, for which I am very grateful, granting an ex parte application which extended by two weeks the time to oppose the above-described motion for summary adjudication. On March 17 Scientology served on me another motion for summary adjudication, this of the 13th, 16th, 17th and 19th causes of action of the second amended complaint. This motion seeks $200,000.00 in liquidated damages.

4. Scientology's motion for summary adjudication of the 20th cause of action and supporting documents is over six inches thick. The second motion and supporting documents is another two inches.

5. A little over two weeks ago I experienced a profound spiritual and psychological crisis and my psyche and physical being are only now beginning to normalize. I lost a great deal

of strength and functionality and my normal mode of communication. I was immobilized and unable to speak at times, and at other times during this period was able to speak only haltingly and through great psychic anguish.

6. I have, in spite of that, worked as able to oppose Scientology's motions. I have located and communicated with almost all of the people, including individuals in the United Kingdom and South Africa, who will be providing declarations to support my oppositions. I have a direction for my oppositions which I believe will be adequate and successful. My request for an extension, therefore, is not frivolous, but will promote justice by giving me the chance I need to defend myself. Scientology will not be prejudiced in any way if an extension is granted.

7. From the time Mr. Greene substituted out I have attempted to obtain competent counsel to represent me in this litigation. I have now communicated substantively with eleven attorneys, each of whom has thus far declined to represent me. I have also communicated with a number of organizations which have an interest in the First Amendment issues which my case presents and which may be able to assist financially or with creating a public forum for and focus on the case's issues. I am confident that help is on its way. An extension of two weeks will also give me an opportunity have an attorney assist in my oppositions or at least review my work, if I am able to obtain legal help in the next two weeks. These summary adjudication motions are

extremely important and will set the stage and guidelines for the May trial. Any attorney who might become involved in my case would want to have as much input as possible into what that stage and guidelines will be.

8. I communicated in my last application that I did not have a computer or printer. I have now obtained a computer and, God willing, I will have a printer in the next few days. I have borrowed Ford Green's printer for this document.

9. I am requesting that the hearing on the motion for summary adjudication be set for April 28, 1995.

10. I advised Scientology attorney, Laurie Bartilson, by phone at 11:20 a.m. yesterday that I would seek a continuance of the hearing date ex parte today if she would not agree to such a continuance. I followed this up with a faxed letter, a copy of which is appended hereto as Exhibit A.

11. I apologize to the Court for not being able, despite my best efforts, to meet my commitment after it graciously granted my earlier request for an extension. I again ask for its patience and mercy.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at San Anselmo, California, on March 29, 1995.

GERALD ARMSTRONG

ORDER

GOOD CAUSE appearing therefor, it is hereby ORDERED that the hearing on plaintiff's motion for summary adjudication of the twentieth cause of action of the second amended complaint, and the hearing on plaintiff's motion for summary adjudication of the thirteenth, sixteenth, seventeenth and nineteenth causes of action of the second amended complaint shall be continued to 9:00 a.m. April ~~28~~ 21st, 1995. - 9AM

DATED: March 29, 1995

Gary W. Thomas

Judge of the Superior Court

March 28, 1995

Laurie J. Bartilson
MOXON & BARTILSON
6255 Sunset Boulevard, Suite 2000
Los Angeles, CA 90028

By Fax (213)953-3351

RE: **Scientology v. Armstrong**
Marin County Superior Court
Case No. 157 680

Dear Ms. Bartilson:

This is to put in writing our telephone conversation of this morning in which I said that I required an additional two weeks to prepare adequate responses to the two pending summary adjudication motions, and that if you would not grant such I would seek an extension ex parte from Judge Thomas tomorrow morning at 0900, and you said that you not would grant an extension.

Thank you.

Yours sincerely,

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450

cc: Andrew H. Wilson, Esquire (by fax)
cc: Michael L. Walton, Esquire (by fax)

9:00 am DEPARTMENT: 01 Honorable Gary W. Thomas **REPORTER: J. KNETZGER** **CLERK: J. BANKSON**

CASE #	INV.	PERSON/PARTY NAME	ATTORNEY FIRM	HEARING TYPE
8- CIV 157294		**BERTHE MEGHNAGI VS JAMES AND MICHELLE BUSH, ET AL**		
	PLTF:	MEGHNAGI, BERTHE	KAUFMAN, JEFFREY, present	MOTION FOR ENTRY OF JUDGMENT PURSUANT TO TERMS OF STIPULATED SETTLEMENT AND REQUEST TO RETAIN ENFORCEMENT JURISDICTION (PLTF) BERTHE MEGHNAGI
	DEFT:	BUSH, JAMES	SPECTER, RONALD C.	
	DEFT:	BUSH, MICHELLE	SPECTER, RONALD C.	
	DEFT:	CHAN, ROBERT	GEMPLE, HERBERT D. BLACKSTONE, CRIAG R.	
	DEFT:	CHAN, SYLVIA		

THE MOTION IS GRANTED. GOOD CAUSE APPEARING THEREFOR, IT IS HEREBY ORDERED AND ADJUDGED THAT A JUDGMENT BE ENTERED ACCORDING TO THE SETTLEMENT AGREEMENT EXECUTED BY THE PARTIES HERETO, UNDER CCP 664.6. THE COURT SPECIFICALLY REJECTS DEFENDANTS ALTERNATIVE PROCEDURE FOR A STIPULATION OF JUDGMENT AS SUCH PROCEDURE IS CUMBERSOME AND NOT IN AGREEMENT WITH THE PARTIES' INTENTION. THE COURT RETAINS ENFORCEMENT JURISDICTION OVER THE JUDGMENT. (see below) *

CASE #	INV.	PERSON/PARTY NAME	ATTORNEY FIRM	HEARING TYPE
9- CIV 157680		**CHURCH OF SCIENTOLOGY INTERNATIONAL VS. GERALD ARMSTRONG ET AL**		
	PLTF:	CHURCH OF SCIENTOLOGY INTERNA	BARTILSON, LAURIE J. Wilson, Ryan Et Al Wilson, Andrew Harris	MOTION FOR SUMMARY ADJUDICATION OF THE TWENTIETH CAUSE OF ACTION OF PLFT'S COMPLAINT (PLTF) CHURCH OF SCIENTOLOGY INTERNATIONAL
	DEFT:	ARMSTRONG, GERALD	PRO PER	
	DEFT:	BEHBEHANI-WALTON, SOLINA		
	DEFT:	THE GERALD ARMSTRONG CORPORAT	PRO PER	
	DEFT:	WALTON, MICHAEL	PRO PER	
	CRCO:	ARMSTRONG, GERALD	PRO PER	
	CRDF:	CHURCH OF SCIENTOLOGY INTERNA	BARTILSON, LAURIE J. Wilson, Ryan Et Al Wilson, Andrew Harris	

CONTINUED TO APRIL 21, 1995 AT 9:00 A.M.

---

* #157294 Meghnagi vs. Bush
Tentative ruling is stayed to April 21, 1995. Tentative ruling becomes final on April 21, 1995 if an alternative judgment is not in place.

ORIGINAL

5670

FILED

APR 10 1995

HOWARD HANSON
MARIN COUNTY CLERK
By ________ Deputy

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450

In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive,

Defendants.

No. 157 680

DECLARATION OF LAWRENCE WOLLERSHEIM IN OPPOSITION TO MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT

Date: 4/21/95
Time: 9:00 a.m.
Dept: One
Trial: 5/18/95

DECLARATION OF LAWRENCE WOLLERSHEIM

I, Lawrence Wollersheim, declare:

1. I am over the age of 18 years. I am a resident of the State of Colorado. I have personal knowledge of the matters set forth herein, and if called upon as a witness I could testify competently thereto.

2. I was an active member of Scientology from the period of 1968 - 1969 through 1979 - 1980.

3. I am the plaintiff in the case of Wollersheim v. Church of Scientology of California, Los Angeles Superior Court No. C 332027. After a four and one half month trial in 1986 I was awarded a judgment against Scientology in the amount of $30,000,000.00. On appeal, the California Court of Appeal upheld the judgment but reduced the damages awarded to $2,500,000.00. Wollersheim v. Scientology, 260 Cal.Rptr. 331 (1989), upheld by the United States Supreme Court.

4. I have also been sued twice by Scientology pursuant to its "fair game" policy, Scientology v. Wollersheim, US District Court for the Central District of California, No. CV 85-7197 JMI (Bx), which was dismissed against me, and Scientology v. Wollersheim, Los Angeles Superior Court No. BC 074815. I was awarded $135,000.00 in this frivolous lawsuit pursuant to California's SLAPP Statute.

5. Since 1979, I have been the target of the notorious "fair game" policy, originated by Scientology's founder and leader L. Ron Hubbard. This policy calls for critics of

Scientology, designated by the organization as "enemies" to be tricked, cheated, sued and destroyed. This policy permits, in fact urges, Scientologists to do virtually anything in the service of Scientology to attack its targeted enemy.

6. In 1993 I, with others, formed a non-profit corporation, FACTNet, Inc., a cult abuse victims advocacy organization that serves as a library and historical preservation archive which collects, preserves and makes available information on groups and organizations which employ sophisticated and dangerous techniques of mind control. For more information on FACTNet, its goals and purposes, see one of FACTNet's publication regarding its mission, history and accomplishments appended hereto as Exhibit A. Because of my experiences and knowledge of Scientology, because I have continued to be its fair game target, and because it is widely known as the largest and most psychologically dangerous of all the organizations using advanced psychological coercion practices, FACTNet has a large archive of information on Scientology which it has collected, preserved and made available to our library users.

7. In 1993 I asked Gerry Armstrong to be on the board of directors of FACTNet. I did this because he is known to me to be an abuse victims advocate, and honest and courageous, having stood up against Scientology's fair game practices and its formidable litigation machine for then over a decade, and I trusted him. Armstrong was never involved in the management

or operations of FACTNet in any significant way or for any significant length of time. Later, because of the concern that Scientology would mischaracterize Armstrong's relationship with FACTNet, and use its mischaracterization in legal attacks, he resigned his position on our board of directors.

8. I also asked Armstrong to be involved with FACTNet because he is a victim of Scientology's cult abuse and was, and is, defending a case brought against him by Scientology to silence him. I knew from having talked to Armstrong about his pending case, and from reading many documents relating to that case, and from my knowledge of Armstrong's prior history and legal involvement with Scientology, that Scientology was seeking to use the courts to silence him and deny him his Constitutional rights, including his freedom of religion and right and need to defend himself against fair game. I also knew, from my own experience, study and communications with dozens of people affected, that the "settlement agreement" which Scientology was seeking to enforce was one of several such "agreements," which, in my opinion, individually and together constituted a massive obstruction of justice. Armstrong, therefore, like any other Scientology victim, had a need for FACTNet to help him defend himself against that organization, and its litigation and fair game machines. FACTNet has assisted Armstrong, because he is a victim of Scientology's abuse. We have assisted him with fund raising,

obtaining legal help, spiritual support, and in telling the world the story of the abuse of Gerry Armstrong.

9. Appended hereto as Exhibit B is a true and correct copy of one of FACTNet's research publications entitled "Scientology's Policies Toward Its Adversaries." This document details Scientology's history of unclean hands and general bad faith in bringing actions such as this one. Scientology has been involved in criminal acts against its adversaries, and has used the court systems around the world to support these criminal activities, for decades. If these materials are fully read by the Judge and other decision-makers in the current action, there will be no doubt about why Scientology is trying to silence and crush Armstrong. Their efforts to silence and crush him are to suppress critical knowledge and counter-opinions about Scientology's nature and activities, activities which threaten the public well-being and safety.

10. The information that Armstrong brought with him out of Scientology, that was made public for the first time through his efforts, and became judicially credited during the course of the first lawsuit Scientology brought against him, has been essential to the understanding of Scientology's mind control, fraud, and fair game activities. Armstrong documented and exposed the real nature and history of L. Ron Hubbard, his falsified credentials, vindictiveness and aggressiveness toward anyone who opposed him, and his and his

organization's victimization of countless people around the world. Armstrong's material is used by government investigations and by countless people around the world to educate and counsel about Scientology and its actual intentions, practices and dangers. Scientology wants to silence and discredit Armstrong because his materials free victims by giving them access to what they need to make informed choices, and Scientology doesn't want its victims free, but under its domination or shuddered into silence. It is imperative, for free minds and a free society that Scientology not be allowed to achieve its goal of suppression of Armstrong's information.

11. I know that Scientology calls itself a religion, claims that it is organized for only religious purposes, claims that its activities are religious, and that all of its writings on any subject with Scientology; whether they be about financial matters, physical health or how to wash a car; whether they order using the courts to harass people, to utterly ruin critics, and even the "fair game" policy itself, are "religious scriptures."

12. It has come to my attention that Scientology is seeking to have the court in the Armstrong case order the removal or seizure of all materials in FACTNet's possession which relate in any way to Scientology. The order Scientology seeks reads: "within 20 days of the issuance of this Order, Armstrong shall: 1. Remove all information concerning

Scientology, the Church and/or any person or entity referred to in paragraph 1 of the "Mutual Release of All Claims and Settlement Agreement" of December, 1986 from any and all databases, electronic or otherwise, within the possession, custody or control of FACTNet." This proposed order that Scientology is trying to push through court against Armstrong is an effort to deceive the judge on the case so that Scientology can later use this overbroad order to harass, raid and destroy a public library and historical preservation archive. FACTNet's library and archive possess thousands upon thousands of documents relating to Scientology and/or Armstrong that have been or are legally in the public domain and/or received from many other sources than Gerald Armstrong. FACTNet possesses many of Scientology's own writings that have been or are legally in the public domain. A court-ordered removal or seizure of these materials, which Scientology itself always claims are "religious scriptures" would be tantamount to seizing Holy Bibles or commentaries on the Bible, in the possession of out-of-favor former members of a Christian church.

13. My 26 years of experience and my study of hundreds of thousands of pages of evidence have brought me to the unshakable conclusion that Scientology is the world's largest secret neo-satanic "religion," with thousands of fanatical members in hundreds of highly organized, centrally controlled "churches" worldwide, using sophisticated mind control and

intelligence operations and employing hundreds of non-Scientology lawyers and "private investigators" to carry out its goal of smashing all opposition to its mad and dangerous plan for world domination. See "Scientology's Policies Toward Its Adversaries," Exhibit B hereto.

I declare under the penalty of perjury under the laws of the colorado and California that the foregoing is true and correct.

Executed at 601 16th St, Jefferson County, Colorado, this 7th day of April, 1995.

Lawrence Wollersheim

5678

F.A.C.T. Net Inc.

Fight Against Coercive Tactics Network, Incorporated

a nonprofit computer bulletin board and electronic library

In the United States alone an estimated 5,000 economic, political, and religious groups use tactics of coercive mind control...p.6

"Only you have the right to control your mind"

FACTNet 's MISSION

FACTNet is an international, nonprofit, educational, social justice organization that opposes human rights abuse caused by coercive mind control.[1] FACTNet seeks to promote dialog concerning this issue, much as Amnesty International[2] promotes dialog on issues of human rights abuse caused by physical coercion.

FACTNet provides a unique research, investigatory, and educational information clearinghouse on coercive mind control tactics. It informs the public how their lives are being negatively influenced by the growing number of groups using these dangerous tactics. FACTNet brings advanced technology to the struggle for social justice by delivering services through state of the art telecommunication and information management technologies.

Our mission is to educate. We provide information on coercive mind control from many sources and perspectives. The individual decides the truth.

HOW FACTNet ACCOMPLISHES ITS MISSION

Information access is the proven solution to stop current abuse, help victims recover, and prevent future abuse. Technology makes information available faster, more easily, more broadly, and at less expense. This maximizes the "information solution."

FACTNet provides high technology information services to victims and their families, professionals, governments, the media, and other organizations. FACTNet provides numerous information services including an electronic lending library, electronic mail and resource referral, electronic news transfer services, and expert research consulting. [More information is available upon request about FACTNet's seven main purposes, guiding principles and three-phase business plan.]

---

[1] For a technical description of what constitutes coercive mind control, see the FACTNet publication titled *A Technical Overview of the Tactics of Programs of Cumulative Psychological Coercion.*

[2] FACTNet is not associated with Amnesty International in any capacity.

FACTNet's HISTORY

FACTNet began as a nonprofit organization in June of 1993. We have received our 501(c)(3) tax exempt status from the IRS and established our corporate structure. We have purchased all necessary insurances, filed appropriate trademarks, and run six months of limited user testing of the computer telecommunications capabilities.

Our Board of Directors consists of Jon Atack, Lawrence Wollersheim, and Bob Penny — all victims of coercive mind control who, having successfully survived, are now dedicated to educating the public. Our Board of Advisors includes Dr. Margaret Singer, Ph.D., Emeritus Professor of Psychology at UC, Berkeley; Eugene H. Methvin, Senior Editor, *Reader's Digest*; Andrew A. Skolnick, M.S., Associate News Editor, *Journal of the American Medical Association*; Edward Lottick, M.D.; Kent Burtner, M.Div.; and Ford Greene, Esq.

During the first year, approximately $190,000 in cash and labor was invested to bring FACTNet's services on-line.[3] This time was spent in a testing phase, researching, developing, and debugging computer and software technologies; training staff; and developing administrative work flow and security policies.

By the end of its first year, FACTNet had acquired computers and software sufficient to handle approximately 5,400 information service calls per month. Our on-line searchable database contained approximately 50,000 pages of text. Our archives of scanned pages contained approximately 1.8 gigabytes of image files.

WHAT WE HAVE ACCOMPLISHED SO FAR

While still in its non-public testing phase, FACTNet was able to provide information services to several hundred victims of coercive mind control, assist a foreign government in its investigation of a group using coercive mind control, and help, in significant part, to win four major litigation victories against one of the world's largest abusers of coercive mind control.

For an organization that hasn't yet gone public, FACTNet already has had a powerful effect on human rights abusers. One destructive organization so fears FACTNet's growth that it is refusing to pay a multi-million dollar judgment to a former member in part, we believe, because it fears (correctly) that the former member will make a substantial donation to FACTNet, the organization that played a key role in its defeat.

---

[3] This amount includes the cost of equipment purchased, databases created or acquired, income from services rendered that were reinvested, loans, and the value of paid and volunteer labor and consultant services.

With no more than word of mouth about FACTNet's unique electronic information services, FACTNet has received numerous information requests from leading media around the world. From FACTNet's media connections, several major media exposès about destructive organizations using coercive mind control are in the works or already published. Recent examples include the *Sussex Observer*, the Australian *Woman's Day*, and the English *Daily Mirror*. [Ask for more complete references.]

FACTNet's goals are supported by one of the world's leading and most credible resources for research on coercive mind control and the destructive organizations that use it, the American Family Foundation (AFF). The AFF is providing fourteen years of accumulated research and work to be scanned, computerized, and made available through FACTNet's telecommunication services.

FACTNet's goals are also supported by Graham E. Berry, of the Los Angeles law firm Lewis, D'Amato, Brisbois and Brisgaard, and by David J. Bardin, of the Washington, D.C. law firm Arent Fox.

FACTNet already has the largest computerized library in the world on Scientology and has acquired a substantial volume of materials on other destructive organizations using coercive mind control. These additional materials are in the process of being scanned and computerized.

Our initial results only preview the tremendous social justice leveraging capabilities that will become available as FACTNet's information services become more widely known and used by the public.

OUR CURRENT NEED

FACTNet needs additional funding to handle the huge volume of service requests anticipated as FACTNet expands its public outreach and connects to the Internet — the "information super highway" that you are hearing so much about in the news. The Internet now connects 20 million computers worldwide, is growing at 10% per month, and by the year 2000 is expected to connect one billion computers.[4]

Resources are needed for several immediate purposes:

- **acquire additional computer and telecommunication equipment, software, phone lines, and an Internet connection,**

  The additional equipment requirements are appropriate to what will quickly grow to 8,000-10,000 computer information and service request calls per month. This is anticipated when FACTNet links to and becomes known on the Internet, to millions of other computer owners, and to users of other computer networks.

---

[4] Already there are many on-line news and discussion groups on the Internet that deal with coercive mind control and the destructive organizations that use it. We have been told that just one of these, called **alt.religion.scientology**, has received 42,000 calls. This is just electronic mail, where callers can read and send messages. FACTNet's searchable electronic libraries, plus electronic mail and other services, offer a powerful and previously unavailable educational and networking resource.

- **complete the computerization work on the 100,000-page American Family Foundation library acquisition,**

It will take resources to bring the full AFF library on-line. This is one of the the world's leading and most credible non-computerized resources for research on coercive mind control and the destructive organizations that use it. Over 100 respected interdisciplinary professionals have contributed to the AFF library over the past fourteen years.

The American Family Foundation's scholarly journal, *Cultic Studies Journal*, has published more than 125 articles on cults and psychological manipulation. Their review of press reports, *The Cult Observer*, has reviewed more than 3,000 media reports during the past fourteen years. The AFF also has other scholarly articles about cults and general information about more than 300 different cultic groups that use coercive mind control.

The AFF library commands immediate respect and credibility. FACTNet's linkage with it will help other organizations and individuals become familiar with FACTNet's services. This association benefits AFF because their researchers in psychiatry, psychology, sociology, the media, and law, will be able to do their own work in new and better ways (for example, on-line surveys and questionnaires), and more effectively communicate their research and findings to each other and to the public.

From an outreach and credibility viewpoint, adding the AFF library to FACTNet's existing library will markedly increase FACTNet's appeal to a global public.

- **hire more staff and pay the volunteer staff who will be staying on to meet the public service requests and to computerize the AFF library,**

Paid staff will be needed to service the library and escalating service/research requests.

- **begin outreach promotion of FACTNet's services to those who need them but are unaware that such resources exist,**

Organizations that use coercive mind control operate by restricting information and creating phobias about professional help. We have to very deliberately reach past those barriers and make more people aware of our existence and capabilities. A more effective outreach will better position FACTNet to be of service on a larger scale to victims and their support professionals.

- **and, set up a financially self-sustaining gift and revenue-creating program to help secure FACTNet's future while we develop service revenues.**

Our budget forecasts service revenues from user subscriptions, downloads, fax-on-demand, database research, and other sources, but this will not support us until we get all services on-line and widely known. We need to create an ongoing gift program to remain financially secure for the three years it is projected to take until our service revenues grow to a sufficient level.

[Request a copy of our projected budget for full details on the projects listed above.]

5683.

WHAT YOUR SUPPORT WILL ACCOMPLISH

We will be able to deliver 24-hour/day, 7 days/week telecommunication information services to a global Internet and non-Internet public and make an even more powerful difference.

Victims of destructive groups that use coercive mind control, or their families, can immediately access information to understand what has happened to them, information on resource connections they need to formulate a plan of action, and information for the challenging recovery process.

Mental health professionals and clergy can immediately access updated information and resource connections they need to help victims and families, network among themselves, and obtain needed referrals.

Attorneys and government agencies can immediately access information and resource connections they need to prosecute those individuals or groups who have broken the law or seriously damaged individuals. Civil and criminal investigations can be researched inexpensively.

Journalists and educators can immediately access information and resource connections they need to expose abuses, forewarn the public, develop preventive educational programs and give accurate well rounded descriptions of this area of human rights abuse.

Victim rights advocates and other anti-abuse organizations can immediately access information and resource connections they need to defend against the sometimes malicious legal and other harassments that destructive groups using coercive mind control often use in an attempt to silence those they perceive as opponents.

THE URGENCY OF THE PROBLEM

"Existing data now suffice to convince any reasonable person that the claims of harm done by cults are bona fide. There are a good many people already dead or dying, ill or malfunctioning, crippled or developing improperly as a result of their involvement in cults. They are exploited; they are used and misused; their health suffers; they are made to commit improprieties ranging from lying ('heavenly deception') to murder. Their lives are being gobbled up by days, months, and years."[5]

In the United States alone an estimated 5,000 economic, political, and religious groups use tactics of coercive mind control to deceptively influence millions of victims.[6] Almost everyone today knows

---

[5] Louis Jolyon West, M.D., professor and former head of Department of Neuropsychiatry at the University of California in Los Angeles, "Persuasive Techniques in Contemporary Cults: A Public Health Approach," *Cultic Studies Journal*, volume 7, no. 2, 1990.

[6] Dr. Margaret Thaler Singer, Emeritus Professor of Psychology, University of California at Berkeley. Dr. Singer studied approximately 3,500 victims of coercive mind control programs during her 40 years of research and writing.

5684

someone who has been the victim of one of these destructive groups. They ruin tens of thousands of lives and take hundreds of millions of dollars from their victims. They have bought or extorted dangerous influence over our courts, mass media, and other institutions.

The cause of this growing human rights problem today is twofold. First, information about advances in the technologies of coercive mind control is generally not known in our society, and second, those who exploit these technologies gain an invisible control advantage which is too profitable not to be exploited by the unscrupulous.

The growing use of coercive mind control poses a very real danger first, to its immediate victims, and also to our families, lives, and civil liberties. Our most basic freedoms are invisibly threatened by the growing use of practices which restrict information and bypass the victim's awareness to obtain compliance through deceptive technological processes of influence (as opposed to dialog, debate, or any other appeals to reason which are otherwise open, rational, and participatory).

History has taught us what can happen when coercive mind control prepares the ground for physical coercion. Tactics of coercive mind control were used in the authoritarian environment of Nazi Germany. Ruthless individuals like Hitler, Stalin, and Mao Tse-tung were able to sway whole populations into believing ideas and committing acts that ultimately led to the creation of concentration camps, Gulags, and to the needless deaths of tens of millions of people. With the advantage gained over their members with the technologies of coercive mind control, these groups were able to exercise a vastly disproportionate influence over the political, economic, and religious systems of their times.

Today we have even more advanced and subtle technologies, with symptoms such as Jonestown, Waco, and Scientology.

Looking ahead to the future, already we see that groups using coercive mind control with political and economic ambitions apparently forming well funded coalitions that create disinformation campaigns to deny the existence of coercive mind control, and to harass and silence researchers and victim advocate groups.

Many human rights advocacy groups are handicapped in dealing with this problem because they are technology-poor and lack funding for qualified data processing and telecommunications staff. Victim advocate groups, their lawyers, social science researchers, and others urgently need the technology advantage to "level the playing field." Otherwise, they will be silenced. Their voices are needed if we are to avoid continuing social and individual catastrophe.

WHAT WE NEED FROM YOU

Even if you don't know a victim personally, all of us, and our families, have minds and freedoms that can be lost if this subtle and covert technology continues unchecked in the hands of the greedy and ruthless. We all have a personal stake in solving this challenge to our basic human rights because, like it or not, we all have minds and we are all vulnerable. Please recognize a clear and present danger and somehow overcome the denial that Dr. Singer describes:

> ". . . most citizens like to think that their own minds and thought processes are invulnerable. 'Other people can be manipulated but not me,' they declare. People like to think that their opinions, values, and ideas are inviolate and totally self regulated. They may admit grudgingly that they are influenced slightly by advertising. Beyond that, they want to preserve the myth in which other persons are weak minded and easily influenced, but they are strong minded. People cherish a fantasy that manipulators confront, browbeat, and argue people into doing their bidding. They envision Big Brother coming in storm trooper boots, holding guns to their heads, and forcing persons to change their beliefs, alter their personalities, and accept new ideologies. Orwell drew on the wisdom of the ages; most manipulation is subtle and covert. . . . This myth of invulnerability needs to be examined over and over to prevent Orwell's 1984 world from ever happening."

A fundamental principle of democratic society is the Jeffersonian concept that man is a rational animal, and that if he or she is allowed to be rational then our system will work. John Dewey said it this way: "The human power to respond to reason and truth protects democracy." Coercive mind control works by bypassing or undercutting rationality and informed free choice.

The growing use of coercive mind control poses an ultimate theft of our most important freedoms. It is an invisible theft of one's ability to think rationally, one's free will, informed consent, and individual conscience. Eventually if left unchecked, it will destroy or adversely affect all of our cherished freedoms.

Applied politically, coercive mind control is perhaps the greatest threat to democracy today. It is totalitarian in approach and antithetical to democracy. It may become our road to involuntary servitude and high-tech slavery in the information age if we don't do something now that is effective to inform the public and empower victim advocate groups.

FACTNet is the largest scale, most effective, and most promising "information solution" to these problems. It exists to help level the playing field. Its information technology leverages the efforts of others and immediatly benefits information distribution and resource networking for all victims and victim advocate organizations.

Your help is needed now in the form of a gift or pledge, and in networking us to others who will support our cause. Please give generously.

F.A.C.T.
Net

601 Sixteenth Street #C-217
Golden, Colorado 80401 U.S.A.

BBS: (303) 530-1942
Fax: (303) 530-2950
Office: (303) 473-0111

SCIENTOLOGY'S POLICIES TOWARD ITS ADVERSARIES

> "In addition to violating and abusing its own members' civil rights, the organization over the years with its "fair game" doctrine has harassed and abused those persons not in the church whom it perceives as enemies."
>
> *-- LA Superior court judge Paul Breckenridge in a June 1984 ruling in the Gerry Armstrong case.*

I. Documentation of Scientology's Adversarial Tactics – Overt Operations

1. Bold Faced Direct Lying pages 66-72

2. Professional False and Evil Propaganda Campaigns pages 73-75

3. Setting Up or Using Social Reform Groups Whose Real Purpose is to Defend Scientology and Attack its Enemies pages 76-77

4. Using a Front Law Firm as a De Facto Extension of Scientology's Intelligence Division, and Intimidation Intelligence Strategy page 78

5. Deliberately Recruiting and Using "Anything-to-Get-the Fee" Private Investigators pages 78-79

6. Possibly Buying Political Influence pages 79-80

J. The Armstrong Case pages 81-88
An example showing how Scientology puts all these adversarial tactics to work

K. The Wollersheim Case pages 89-92
Another example showing how Scientology puts the tactics together, including a "history re-write" of specific areas in Wollersheim's past.

L. More Scientology Intelligence Operative Training Materials pages 93-12

M. Conclusion pages 126-129

Prior Sect Try a Judge Reported pages 130-138
This article provides an example of Scientology's secret policies and attitudes in the real world

Shudder into Silence pages 139-143
An article showing how Scientology and its adversarial tactics came into being and have not changed

9. Framing Critics for Lewd Sexual Conduct — page 30

10. Framing a Critic for Connection to Organized Crime — page 30

11. Burglary and Theft — pages 30-36

12. Attempting to Get a Person Incarcerated in a Mental Institution — page 37

13. Impersonating Someone to Frame or Discredit Him — pages 37-43

14. Sending Bomb Threats and Framing Someone Else For It — pages 44-46

15. Using Confidential Materials, Disclosures, or Confessions Given to Scientology by its Members to Blackmail, Silence, or Intimidate an Individual, Should that Person Leave Scientology or Become Critical of Scientology — pages 47-50

16. Infiltrate the Court System — page 51

17. Possible Scientology Involvement in Conspiracies to Commit Murder or Assault (Also see Exhibit 23) — pages 51-53

H. Scientology and its New Practice of Legal Brutality — pages 54-80
A summary of what these techniques are.

The main nine techniques of Scientology's legal brutality in and out of the courtroom. — page 56

1. Swearing Out False Lawsuits to Intimidate, Harass, Stop, or Discredit a Critic or Enemy — page 56

2. Repeated Use of Frivolous and Expensive Lawsuits to Deter Individuals and Media from Stating Anything Hostile to Scientology Whether Factual or Not — page 57

3. Bludgeoning Opposing Witnesses — page 57

4. Repeatedly Ignoring Court Orders and Authority — page 58

5. Attacking Judges to Stop or Slow the Case — page 59

6. Doing Everything Possible to Create Their Own Mistrial — page 60

7. Extensive Suppression of Critical Information — page 60

8. Filing Meritless Complaints with Legal, Medical, and Other Professional Ethics Boards — page 63

9. Possibly Creating Dummy Cases Where in Fact Scientology is the Hidden Controller and Financier of Both Complainant and Defendant — page 64

Exhibit 2, Scientology's Policies towards its Adversaries

This comprehensive Exhibit is drawn from evidence submissions from numerous past Scientology lawsuits and investigations.

A. Scientology's Public Position pages 2-3
An understanding of what Scientology wants you to believe about who and what it is.

B. Attack pages 4-9
Scientology's attack policies and history

C. Overwhelm pages 10-13
Scientology's policies of overwhelming its adversary in paper, expense, work, and other activities which make its adversaries unable to sustain court or other justice procedures

D. Deception page 14

E. Fair Game page 14

F. Attack the Enemy's Plan pages 14-15
This section overviews Scientology's tactics to thwart its adversaries in and out of the courtroom

G. Documentation of Scientology's Adversarial Tactics and Covert Operations pages 16-53
Pages 16 and 17 summarize the main tactics of covert operations against Scientology's adversaries in and out of the courtroom. The following pages, through page 53, provide detail on covert operations against Scientology's adversaries.

1. Electronic Eavesdropping and Bugging page 17
2. Creation of False Identification and Documents page 17
3. Infiltration of Enemy Organizations page 24
4. Impersonating a Reporter to Gain Access to Obtain or Plant Information for Scientology page 25
5. Breaking and Entering the Attorney Offices of a Critic or Enemy pages 28-29
6. Forced Detention of an Enemy or Critic page 30
7. Staging a Fake Hit and Run Automobile Accident page 30
8. Circulating Discrediting False Public Relations Stories page 30

SCIENTOLOGY'S PUBLIC POSITION

We hear the same well-rehearsed lines again and again from Scientology's executives, Scientology's public relations people, Scientology's $200-$500 per hour attorneys, Scientology's front groups and Scientology's undercover operatives. Once you recognize the pattern, you will be well qualified to judge the truthfulness, the purpose, and the real or hidden affiliation and loyalty of the person delivering these messages. Underlines are added for emphasis.

"A small [1]group of Scientologists ran amok in the 1970's, the church has since cleaned house."

"Current leaders admit (old leaders) were out of control."[2]

"We are a changed and new organization. The church is trying to mend relations."

"The allegations of brainwashing, harassment, and other "fair game" tactics that the civil plaintiffs cite today in tort claims for intentional infliction of emotional distress---and the similar allegations in Behar's article --- are baseless attacks on First Amendment protected religious practices."[3]

"The strident propaganda fostered by civil plaintiffs and their counsel are repetitive time and time again on matters of such ancient history as have no relevance to the present time."[4]

"...The church is being harassed with fictitious allegations designed to extort money," growls Cooley, (one of their lead attorneys,) who derides the propaganda of plaintiffs.[5]

"Documents recently obtained from the IRS and the FBI seem to vindicate some of the paranoia of the church leaders in the late 70's, apparently showing that the church was improperly targeted

---

[1] Thousands of the most senior level Scientology executives and other security cleared Scientologists world wide were involved in Guardian office covert operations. This was no small or renegade group. It was completely in control. It ran and organized secret Scientology policy from the top of the organization down. See rest of this appendix for full documentation.

[2] From *The American Lawyer* article, "The Two Faces of Scientology," by William Horne, July\August 1992. Horne's representations of Scientology's public positions may be all the more accurate in light of the possibility that he may have an undisclosed relationship with Scientology.

[3] From *The American Lawyer* article, "The Two Faces of Scientology," by William Horne, July\August 1992.

[4] From *The American Lawyer* article, "The Two Faces of Scientology," by William Horne, July\August 1992.

[5] Particularly, see the Section on Scientology's Black propaganda training later in this appendix. Quote from *The American Lawyer* article, "The Two Faces of Scientology," by William Horne, July\August 1992.

by several government agencies for special investigations."

"Wollersheim had alleged that the church's fair game harassment tactics and coercive religious practices, such as auditing, exacerbated an existing mental illness."[6]

"But what is certain is what is symptomatic of the paranoia displayed ... by most of the 65 lawyers, judges, and litigants interviewed for this article... opposing (litigants) and counsel see Scientology behind every untoward occurrence in their lives, from near misses on the freeway to hangup phone calls..."

Any lie repeated often enough will be believed by someone, and that is the essence of Scientology's propaganda. But let's look at the facts. Consider, as you read the following pages:

* Are these the type of activities meant to be protected under the special First Amendment legal protections, privileges, and immunities given to legitimate non profit, humanitarian, tax free, and charitable religious organizations?
* Are the actions described here being used to protect *financial profit*, and being applied as strategic actions (sometimes lawsuits) to inhibit public participation in the remedial purposes of the justice system and government, the very reason behind the new SLAPP laws.[7]

1. **ATTACK**
2. **OVERWHELM**
3. **DECEPTION**
4. **"FAIR GAME"**
5. **ATTACK THE ENEMIES' PLANS**

These are the five consistent themes that permeate all of Scientology's adversarial conduct. They come directly from the writings of Scientology founder, L. Ron Hubbard, and are embodied in official Scientology policy.

---

[6] From *The American Lawyer* article, "The Two Faces of Scientology," by William Horne, July\August 1992. Details on the "existing mental illness" story are covered fully later in this appendix.

[7] SLAPP law, Code of Civil Procedure 425.16, went into effect January 1, 1993. SLAPP laws are designed to protect people from actions which are part of an ongoing campaign to harass them into submission and silence, to deter them from exercising their First Amendment rights of petition, from exercising their First Amendment rights to speak freely on civic matters, particularly on matters of grave and compelling danger to the public safety and well-being, and to deter them from exercising their First Amendment rights of participating in and with government.

1. ATTACK

"**The purpose of a lawsuit is to harass and discourage rather than to win**....Don't ever defend. Always attack. **Find *or manufacture* enough threat against them** to cause them to sue for peace. **Originate a black PR campaign to destroy the person's repute** and to discredit them so thoroughly they will be ostracized.[8] Be alert to sue for slander at the slightest chance so as to discourage the public presses from mentioning Scientology."

"It is my specific intention that by the use of professional PR [black PR] tactics any opposition not only be dulled but **permanently eradicated.**" From a confidential Board Policy Letter of 30 may 1974 Handling Hostile Agents/Dead Agenting.

"Threat and mystery are the lot of intelligence." From HCO Policy Letter of 11 May 1971.

"The law can be used very easily to harass, and enough harassment on somebody who is simply on the thin edge anyway, will knowing that he is not authorized, will generally be sufficient to cause his professional decease. **If possible, of course, ruin him utterly.**[9]"
From "A Manual on the Dissemination of Material" (1955) by L. Ron Hubbard.

In the U.S., the loser of a lawsuit does not pay the prevailing party's costs. A wealthy party can delay, defeat, and discourage legitimate socially correctional lawsuits by "burying" the average citizen in prohibitive legal costs. This destroys the balance and important purpose of our justice system. Such legal brutality helps wealthy parties unfairly avoid potential convictions, liability, and accountability. In the popular phrase, "You can have as much justice as you can buy."

This is especially harmful in situations involving malicious, oppressive, and outrageous behavior where the individual or organization is wealthy. The costs of this new type of "legal" brutality becomes just another normal or acceptable cost of "doing business as usual." A worst case scenario occurs when the individual or organization is wealthy AND is unfairly and illegitimately abusing the special First Amendment legal protections, privileges, and immunities given to legitimate non profit, humanitarian, tax free, and charitable religious organizations.

---

[8] These tactics are reminiscent of a basic Nazi propaganda principle. If a lie is big enough, told loudly and often enough, most will believe it.

[9] From my experience, the intensity of activities directed against Scientology's adversaries varies according to the level of importance or legal damage that adversary represents. Critical court decisions or other government investigations, or media attention, also tend to increase activity -- which compliments the target in a paradoxical way, suggesting that they are working on something important and are doing something effective.

"NEVER agree to an investigation of Scientology. ONLY agree to **investigate the attackers**....This is the correct procedure: (1) Spot who is attacking us. (2) Start investigating them for FELONIES or worse, using our own professionals,[10] not outside agencies. (3) Double curve our reply by saying we welcome an investigation of them. (4) Start feeding lurid, blood, sex, crime actual evidence on the attackers to the press....Don't ever submit tamely to an investigation of us. Make it rough on the attackers all the way....You can get "reasonable about it" and lose .... so BANISH all ideas that any fair hearing is intended and start our attack with their first breath. Never wait. Never talk about us -- only them. **Use their blood, sex, crime to get headlines**. Don't use us." From HCO policy letter of 25 Feb. 1966, "Attacks on Scientology."

Scientology has put these and its famous "fair game" policies into action throughout its history, *up to the present day*, to remove any obstacles to its interests.

"An enemy, "[they] **may be deprived of property or injured by any means by any Scientologist** without any discipline of the Scientologist...**may be tricked, sued, lied to, or destroyed.**"[11] From HCO policy letter of 18 October 1967, by L. Ron Hubbard, known as the "Fair Game Policy."

---

[10] This was done by "ordained ministers" of Scientology.

• Scientology often states the policy was canceled in the 70's. That is another falsehood. An IRS quote on a Scientology disclaimer has application here. "**Here, despite its written disclaimer, petitioner has clearly manifested its adoption of the policy letters in the OEC, (Organizational Executive Course), by its conduct.**" Most importantly, the Fair Game doctrine is a spotlight illuminating the mind and character of Scientology's alter ego, founder, L. Ron Hubbard.

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]•

RACKET EXPOSED

PETER GOODWIN
JIM STATHIS
POLLY STATHIS
PETER KNIGHT
MRS. KNIGHT
NORA GOODWIN
RON FROST
MARGARET FROST
NINA COLLINGWOOD
FREDA GAIMAN
FRANK HANLEY
MARY ANN TAYLOR
GEORGE WATERIDGE

are hereby declared Suppressive Persons for pretending to have and distribute forged and altered "Upper Level Materials" which were of a Reccords nature and not for distribution.

All Certificates and Awards are canceled.

1. Having stolen or illegally procured these dangerous materials (at the instigation of a Psychiatrist) these persons did plot to misuse them to cause Insanity and Death.
2. False report for money that they would furnish the real materials.
3- They are declared Enemies of mankind, the planet and all life.
4. They are fair game.
5. No amnesty may ever cover them.
6. If they ever come to a Qual Division they are to be run on reverse processes.
7. Any Sea Organization member contacting any of them is to use Auditing Process R2- 45.[13]
8. The Criminals Prosecution Bureau is to find any and all .... crimes in their pasts and have them brought to court and prison.

The Public Distributions of False or Forbidden Or Dangerous Data is a Suppressive Act and a High Crime.

L. Ron Hubbard, Founder

•As much as was possible, all of these evidences has been preserved in their original format including spelling and grammar errors. Illustrations could not be be retained in this text format, but where illustrations were present they are described in parenthesis.

[13] A Scientology process where an individual is to be shot with a 45-caliber pistol.

The danger of the "Fair Game" policy is obvious, and the compassionlessness it produces toward its intended victims is highlighted an HCO policy letter of 25 December 1965. This is in many ways similar to what was said about the Jews in Nazi Germany to promote violence against them.

> "A suppressive person becomes fair game. By fair game is meant may not be further protected by the codes and disciplines of Scientology...They cannot be granted the rights and beingness ordinarily accorded rational beings and so place themselves beyond any consideration for their feelings or well being...The homes, property, places, abodes of persons who have been active in attempting to suppress Scientology are all beyond the protection of Scientology ethics."

These policies have been continually used to frame, smear, or attempt to intimidate or blackmail "suppressive persons." Judges who have ruled against Scientology's position are an excellent example. These include:

Judge Jones, Oregon, 1981
Judge Graae, U.S.D.C., 1976
Judge Brown, Cal. Sup. Ct., 1976
Judge Krentzman, U.S.D.C., Florida, 1976
Justice K. Skelly Wright, D.C., 1974
Judge Ritchey, D.C.D.C. 1979.[14]

Scientology's attempts to harrass and discredit these men, and others, are described in two newspaper articles, "Prior Sect Try at Judge Reported," and "Scientology's War Against Judges" later in this appendix. The source of such conduct is indicated by the following "document #8592" which shows the thinking of those who executed Scientology's attacks on judges.

---

[14] From "Scientology's War Against Judges" *The American Lawyer* 1980 and "Prior Sect Try At Judge Reported," *The Clearwater Sun* January 24, 1984. Copies are included with this appendix. Scientology spent over $200,000 trying to set up one of the judges.

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

Document #8592 consists of several pages of actual Scientology training drills on ways to discredit/smear opponents. On this page, the targets are a government employee, a psychiatrist, a newspaper executive and a Catholic bishop.

Drill ______________:

Recognizing basic effectiveness of plans. Take into account effectiveness, security, legality, workability, etc. when making your decisions. Chose which basic plan is best.

a. General scene: person to restrain/remove, Mr. Jones, employee in local govt. agency attacking the Org.
1. Order hundreds of dollars worth of liquor in Jones's name and have it delivered to his home to cause him trouble and make the liquor store owner dislike him.
2. Call up Jones's boss and accuse Jones of being a homosexual.
3. Send Jones's boss evidence of Jones accepting bribes on his job, with copies to, police and local FBI.

b. General scene: a psychiatrist who has instigated attacks on the org via police and press.
1. Expose his Nazi background to the press with evidence that he still attends local Nazi meetings.
2. Wake him up every night by calling him on the phone and threatening him.
3. Send an FSM in to be a patient of his for a year to disperse the psych during sessions.

c. General scene: a newspaper executive Clyde McDonald who's behind local attacks.
1. poison him while he's asleep so he'll never start another attack.
2. Make known to the paper's owner that McDonald is responsible for the paper's decreasing advertising revenues.
3. Spread a rumor around to the paper's employees that McDonald is a communist.
4. Put itching powder in McDonald's clothes so he'll scratch himself all day, thus preventing him from writing a story.

d: General scene: a grammar school teacher who got an applied scholastics grant canceled and is continuing to cause trouble for ASI in other schools.
1. Cleverly kidnap her and run reverse processes on her while implanting the phrase, "I will never attack ASI again, I love ASI."
2. Get copies of the court records where she was found guilty of child molesting and send a copy to the school principal, board of education, and a few school children's parents.
3. Send a male FSM in on her who, after she falls in love with him, will get her to move out of the country with him.
4. Pay ten of her students to write dirty phrases about her on the schoolroom blackboard.

e. General scene: a local Catholic bishop is causing many local attacks on the org.
1. Send several FSMs over to the Catholic church to swear at him in confessionals.
2. Connect him up to abortion and/or pornographic activities.
3. Write the Pope an anonymous letter stating that the bishop

is really a rabbi under cover.

4. Spread a rumor around town that he's against air pollution.

f. Mock up 5 similar examples as above on your own, noting the correct answer.

2. Overwhelm

> "In the face of danger from the Govts or courts there are two errors one can make: (a) do nothing and (b) defend. The right things to do with any threat are to (1) Find out if we want to play the offered game or not, (2) If not to **derail the offered game with a feint or attack** upon the most vulnerable point which can be disclosed in the enemy ranks, (3) Make enough threat or clamor to cause the enemy to quail, (4) Don't try to get any money out of it, (5) Make every attack on us also sell Scientology and (6) Win. If attacked on some vulnerable point by anyone or anything or any organization, always find or manufacture enough threat against them to cause them to sue for peace. Peace is bought with an exchange of advantage, so make the advantage and then settle. Don't ever defend. Always attack. Don't ever do nothing. Unexpected attacks in the rear of the enemy's front ranks work best...."

> "The goal of the department [of government affairs] is to bring the government and hostile philosophies or societies into a state of complete compliance with the goals of Scientology.[15] This is done by a high level ability to control and in its absence by a low level ability to **OVERWHELM. Introvert such agencies. Control such agencies....**"

> "The purpose of the legal officer is to help LRH [i.e., L Ron Hubbard] handle every legal, government, suit, accounting and tax contact or action for the organization and by himself or employed representative, to protect the organization and its people from harm and to **bring the greatest possible confusion and loss to its enemies.**"[16]

The three preceding paragraphs are quoted from Scientology secret policy discovered in COST v. U.S., November 22, 1989. Emphasis added.

It is apparent that anyone critical of Scientology is treated as an "enemy." But more specifically, as reflected in their conduct, just who are the "Enemies of Scientology?"

---

[15] These goals will be clarified in a few pages.

[16] Paragraphs 2 and 3 from Vol. 7 Scientology's OEC entitled Executive Division.

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

THE ENEMIES OF SCIENTOLOGY

...The names and connections, at this time, of the bitterly opposing enemy are

1. Psychiatry and psychology (not medicine).

2. The heads of news media who are also directors of psychiatric front groups.

3. A few key political figures in the fields of "mental health" and education.

4. A decline of monetary stability caused by the current planning of bankers who are also directors of psychiatric front organizations would make us unable to function.

5. The cold war is being fought on home ground and has an apparent target of degrading western society to a point where we are finding it difficult to operate, a degraded society can be swallowed up easily by any enemy.

6. The public is somewhat sympathetic already but in a democracy trials are by public opinion. To win all the way, the bulk of public opinion must be at the level of love us -- hate the enemy.

7. Many groups exist with similar aims. They need organizing and uniting...

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

DG Infos &
DAG Infos

CONFIDENTIAL

RE: INFORMATION BUREAU STATISTICS

As the above has been the subject of much misinterpretation and misunderstanding the following is issued to clarify the definitions of Connection and Incident.

CONNECTION

A Connection is:

A. Any person or group in close connection to a subject under investigation relevant to the subject's environment in P.T. or at any point in the past (see below),

and

B. Any link, familial, social, economic or professional found between a person of interest to Intelligence or under investigation and **any established enemies, potential enemies, the seven areas or key members of the seven areas.**

The seven areas being:

1. Press and Media
2. Intelligence
3. Psychiatric and Mental Health Groups
4. Professional Medical Associations
5. Financiers, Banking
6. Public Relations Groups
7. Drug Firms and Associations...

HOW SCIENTOLOGY APPLIES ITS ADVERSARIAL STRATEGY

During my 10 years experience inside Scientology, one of their top intelligence operatives summarized the essence of their intelligence strategy for the Church of Scientology's total "Art of War,"[17] unconditional victory over any adversary:

1. Destroy any and every type of personal or financial resource the adversary could use to support their attack efforts.
2. Completely isolate the target. Isolate, destroy or "dead agent" any and every ally or alliance of the adversary, which could be of any type of support personal, familial, financial, professional, etc.
3. Destroy the adversary's reputation with black PR or dis-information[18] and
4. Destroy their emotional and psychological sanity and ability to continue by constant hammering.[19]
5. Then keep doing 1-4. not just until the attack is stopped, but ideally until you have insured the adversary will never have any future capacity or inclination to mount any future attack.

---

[17] A book of military and espionage strategy by Sun Tzu used as a basic training manual in most international intelligence agencies.

[18] Using Scientology's intelligence procedures, enemies would either be broken down or accept Scientology's terms for silence or inaction.

[19] Again, it is interesting to note these tactics contain many of the coercive persuasion basics used on POWS, but in this case applied in free society on a non-imprisoned target.

3. DECEPTION

THE FUNDAMENTAL PRINCIPLE OF WAR IS DECEPTION, according to "The Art of War," a handbook of military and espionage strategy used in Scientology training. So in looking at Scientology's conduct against supposed "enemies," don't be surprised to find a continuous underlying pattern of *deception.*

4. "FAIR GAME"

has already been referenced above, and

5. ATTACK THE EMEMIES' PLANS

will be described in detail under a discussion of "covert operations."

This overview has familiarized the reader with the overall nature of Scientology's adversarial strategy. We will now proceed into specific detail and documentation of the methods by which these strategies are implemented.

The following is a partial list of key individuals[20] who have had first hand experience dealing with Scientology's never changing in-and-out-of-court adversarial policy as described in this appendix.

Judge Breckenridge, LA Superior Court
Judge Robert Jones, Portland Oregon
Judge Steffan Graae, U.S.D.C.
Judge Brown, Cal. Sup. Ct.
Judge Krentzman, U.S.D.C., Florida
Justice K. Skelly Wright, D.C.
Judge Ritchey, D.C.D.C.
Los Angeles Federal Judge James Ideman
Los Angeles Federal Special master [judge] James Kolts
Los Angeles Federal Judge Spencer Letts

Former LA District Attorney Raymond Baunoon
Former D.C. Federal Criminal Prosecutor Joseph E. Di Genova
City Attorney's for Clearwater Florida M.A. Goldbrath and James T. Russell

Former opposing attorneys:
  Michael Flynn of Boston
  Gary McMurray of Portland
  Joe Yanni of Los Angeles
  Charles O'Rielly of Los Angeles
  Ford Green of San Francisco
  John Contas of Los Angeles
  Lawrence Levi of Los Angeles.

---

[20] This is by no means a complete list. The story of Judge Swearinger, recently deceased, who presided over the Wollersheim trial, is covered in more detail in this appendix. Many hundreds, possibly thousands, of former members could add their verification stories to this list were they not intimidated into silence by Scientology's tactics. Some individuals have signed non-disclosure agreements with Scientology as part of part of Scientology's cash settlements with them, i.e. Michael Flynn, Paulette Cooper, etc.

DETAIL - PART ONE

DOCUMENTATION OF SCIENTOLOGY'S ADVERSARIAL TACTICS

COVERT OPERATIONS

> "You can be merciless whenever your will is crossed and you have the right to be merciless."[21]

These pages will justify and explain the use, in these documents, of such words as "fanaticism" and the other strong language, describing Scientology's origin, nature, actions, and results.

The adversarial tactics of Scientology fall into three main types:

1) **Covert intelligence operations** carried on at a professional level of sophistication near-comprable to a national security agency operation,

2) A new kind of outrageous courtroom tactics called **"legal brutality,"** and

3) **Overt operations** that could include propaganda programs and other overt attacks. Overt operations such as the "legal brutality" programs often are based on a linkage to related covert operations.

COVERT OPERATIONS

The following is a list of Scientology's covert operations practices, many discovered by the FBI during an authorized search of Scientology's headquarters.[22] This material helps us understand the close relation between Scientology's vicious policies and its malicious actions.

Covert intelligence operations cover the following general areas:

1) Electronic eavesdropping and bugging.
2) The creation of false identification and documents to aid in covert operations.
3) The infiltration of organizations that are enemies of Scientology by obtaining jobs under false pretenses or identification.
4) Impersonating a reporter to gain access as an operative and gain or plant information for Scientology.

---

[21] L. Ron Hubbard, writing to himself in a notebook that would surface later in LA Superior Court in the Armstrong case.

[22] Any reader of this document who has additional evidence ands information concerning Scientology's ongoing activities toward its adversaries is asked to forward details in writing to Lawrence Wollersheim P.O.Box 10910, Aspen Co. 81612.

5) Breaking and entering into the attorney offices of a critic or enemy.

6) Forced detention of an enemy or critic.

7) Staging a fake hit and run auto accident involving a pedestrian

8) Circulating false black PR stories.

9) Framing critics for lewd sexual conduct.

10) Framing a critic as being connected to organized crime.

11) Burglary and theft.

12) Attempting to get a person incarcerated in a mental institution.

13) Impersonating a person to frame or discredit them.

14) Sending bomb threats and\or framing someone else for it.

15) Confidential materials, disclosures, or confessions given to Scientology by members are routinely used to blackmail, silence, or intimidate that individual if that individual should leave Scientology and becomes critical of Scientology.

16) Infiltrate the court system to alter and steal documents and files before, during or after court rulings.

17 Possible Scientology involvement in conspiracies to commit murder or commit assaults

1.) **Electronic eavesdropping and bugging.** The FBI discovered that Scientology's intelligence operatives bugged IRS meetings where the cult's tax status was discussed. They discovered Scientology had detailed training manuals on exactly how to train its operatives to do this.

2.) The **creation of false identification and documents** to aid in covert operations. The FBI discovered that Scientology's intelligence operatives had made false IRS and Treasury department ID's to gain access to Scientology files kept in those agencies. Operatives normally do not just gather information but also *remove information of evidence or plant false information designed to misdirect or incriminate the target.* Scientology's intelligence operation can create or alter documents to manufacture false identification, false evidence, and false histories for itself and others.

This false history practice is known in Scientology as doing a "history rewrite" by creating or altering documents to support Scientology's new version of reality. History rewrites are most often performed on former members who file suits against Scientology or cooperate with the government.

Courts and agencies concerned to protect society or victims of Scientology need to realize that they may be dealing with a professional intelligence agency. *Appropriate security precautions must always be taken.* All documents which Scientology submits must be verified in minute detail. One must always be wary that supposedly secure court files and evidence or your own internal files have been corrupted or altered by Scientology's operatives, moles, and double-agents.

> "In my opinion the church has one of the most effective intelligence operations in the U.S. rivaling even that of the F.B.I." From Ted Gunderson a former head of the F.B.I's Los Angeles office, quoted in the TIME Magazine cover story of May 6, 1991.

Remember that in 1979, nine of Scientology's top world executives pleaded guilty to extensive burglaries, forgeries, "infiltration," "obstruction of justice," and other crimes carried out *against over 100 Federal agencies* including the Dept. of Justice, The Dept. of Defense and the I.R.S.[23].

If one realizes that Scientology runs a world class intelligence agency devoted to intimidating dissent, with a deep-pockets budget and that this agency does what every major intelligence agency does -- they would have an appropriate perspective. The following documents will shed more light on the sophistication of the Scientology intelligence machine.

•See United States v. L. Ron Hubbard et al., Crim. No. 78-401, D.C.D.C. (1979).

17 OCT 71

INT HATTING:
THE STRIKE

A strike is the action of gathering information on a covert basis. It is performed by one or more agents (persons doing the strike), who are intentionally aiming at a target (the desired info, or the person who has the target info, etc.).

It is assumed that the individual is hatted as an INT agent.

The strike is done in 12 steps, and each step follows consecutively (thus, step 2 should not be begun until step 1 is completed, and any new observation pertaining to an earlier step during the doingness of a latter step requires reevaluation of the interim steps and verification of all the data acquired in the process).

The amount of time spent on a step and the amount of info needed for a respective step to be completed depends upon the target. The objective is to get all of the target info, by whatever means is necessary. For example, if the target is well-known and readily accessible to the agent (s), the strike may be achieved very quickly. On the other hand, if the agent (s) knows very little about the target, has no current access to the target, and the target is a large quantity of data, it may take extensive research, planning, and on-target observation to begin the actual strike.

The quantity of knowledge needed to complete each step is relative to the circumstances of the target.

THE STEPS OF STRIKING

1) Receive the assignment to strike. This usually comes in the form of an order from the agent's senior. The senior may either officially order or unofficially suggest the strike, either way, the idea is given to the agent that the info must be covertly gathered from some source.

2) Take ownership of the job. Here the individual determines that he is going to be the one to do the strike.

3) Identify the target. This may be knowing the name of a person or group on whom info must be covertly gathered, or it may be knowing the specific location of the piece of wanted data, or simply being told to "see what they are up to." Either way, the purpose here is to have a starting basis for the strike.

4) Gather info on the target area (the location of the target) for the purpose of striking. This includes any info that would be pertinent to striking. Info is pertinent to striking if it helps the agent to locate (pin-point) the specific target, gain access to the target area and the target, learn the routines of the target area, or anything else that would help to put the agent in control of the target during the strike itself.

5) Determine the most optimum means available for gaining access to the target area, on the basis of the info now known about it. This includes having a cover.

A cover is the pretense the agent assumes to make the strike possible. It includes anything that protects the agent from exposure as the agent of the strike (e.g., assuming the cover of a newspaper man who wants to write an article on Scientology, with the objective of having the target group provide the agent with info on its activities as regards Scientology, but not know that this info will be used by Scientology itself). The most optimum cover is one that excludes the agent from any suspicion by the target. In some instances this would include wearing squeakless shoes, and carrying a large purse or attaché at all times so that the one time the agent is carrying target info in the purse or attaché, he is not questioned about its contents.

6) Gain access to the target area. This may include obtaining full-time employment from the target if the target is an organization, or simply contacting a person on a friendly basis so that the agent can gain access to personal files kept at home, or any other means that provides access to the target and a time span of access to the target that will allow the agent to gather all of the info that is wanted.

It is possible that the access to the data will require repeated strikes -- and thus, long-term procedures (e.g., full-time employment would allow long-term procedures and repeated strikes if the target were an organization).

This step may also be called penetration.

7) Directly observe the target area for verification of the knowledge gained in the preceding steps and continue to gather new data that would be pertinent to striking. This includes determining the actual security measures used by the target area to keep the target safe. (e.g., guards making security rounds, locked cabinets, maintenance personnel after working hours, closed circuit TV cameras, alarm systems, etc.).

Three tools that are available to the agent (and have been tested and proved valuable in actual strike activity that required very strict security) include:

#1 - SECURITY RULE OF THREE: If the agent observes an activity in the target area occurring three separate times under identical or similar conditions within a given period of time (usually one week), he can use these observations in planning his striking activity.

One always observes for current and usual (predictable) activities in the target area, and accessible exits from the target area for "quick-get-away."

#2 - SECURITY RADIUS: a distance around the target that can be postulated as creating a safe condition for strike activity. The radius may be used to listen for persons coming near the target area during strike-preparation and actual strike activity. (e.g., if the strike requires that no one know that the agent has been in the target area, the agent should be able to hear someone enter his security radius and quickly leave the target area without being seen or heard by the intruder and without leaving evidence of his presence).

#3 - If the target is extensive written material, it may be most optimum to have a separate location from the target area for reading and Xeroxing or transcribing the data -- this is called a SAFE READING PLACE. If this is needed for strike activity, it should be determined during step 7 of striking procedures.

The final aspect of step 7 is evaluation of all data obtained upon direct observation of the target area and re-evaluation of the data learned in the preceding six steps in light of the direct observation data.

8) Determine how to safely get the target information from the target area to the person who wants the info. (This would include making sure that the agent's cover is adequately planned (e.g., the big purse, etc.)

9) Plan the actions, step by step, that will be necessary in doing the strike. For instance, it may be found that the most optimum time to strike is between 12:30 PM and 12:55 PM. Thus the agent would plan to arrive at the target area at 12:31 PM; if the target area is safe (no persons present), he would then proceed to perform the strike, always listening to his security radius for intruders; he would proceed with operations until 12:50 PM, making sure that he is out of the target area by 12:52 PM. This plan might include hitting the target, getting the info Xeroxed in the safe reading place, and returning the target info to its original location by 12:50 PM.

This step includes preparation for any unusual circumstances that might arise and how they would best be handled. For instance, if someone entered the security radius of the above situation at 12:40 PM, would the agent leave the area immediately or wait for the person to leave the security radius?

The purpose of step 9 is to make sure that the agent has enough knowledge to perform the strike safely, accurately, and thoroughly.

10) On the basis of the preceding steps, begin either a pretend dry-run of the strike (to check for unknowns and remedy them immediately) or do the actual strike, depending on the circumstances of the entire situation.

The following is an example. It was actually done by an agent in both dry-run and actual strike procedures at a national organization's headquarters. The agent was a full-time employee of the group, and worked on a different floor from the one where the target info was located. The agent had to maintain a totally safe operating condition during strike procedures (i.e., It was predetermined that anyone within the security radius was dangerous to the agent and warranted stopping strike activity immediately, and that the less time spent in the target area the more safe the operating condition):

a -agent went to the target area -- no one else was present -- proceeded.

b -agent found target file.
c -agent stood near target file -- the label appeared to indicate this file was the target. Agent determined a safe radius for future activity and listened for the usual sounds -- a through c were safe, proceeded.
d -agent checked file contents, always listening to the security radius. Still safe, so agent proceeded.
e- file contents appeared to be wanted, could agent pull them to take to the safe reading place? Yes. Agent proceeded.
f -Agent took file to safe reading place, going by the (predetermined) quickest route, agent observed security radius at all times.
g- target data was exactly what was wanted. Agent Xeroxed data and then hid Xeroxes in a place that was safe while the agent was returning the target materials. This included the possibility that the agent would not be able to return to the hiding place for quite a while and a place that would not indicate that the Xeroxes belonged to the agent if another person found them.
h -agent returned to target area, repeating steps a through c, then put file back exactly where it was found (continually observing the security radius).
i -agent took target data (Xeroxes) out of the building without being suspected. This required wearing a cape under which the Xeroxed data was hidden in a large purse and being friendly with the night guard.
j -Agent took evidence and written report of all strike-related activities to agent's senior within 3 hours after strike occurred.

11) Get info to the person who wants it, by the safest and quickest route.

12) Report all strike-related actions in a written report.

It should be noted here that written progress reports (most optimum) and verbal reports may be given to the agent's senior at any time during the strike procedures. Any report should be written with the objective of informing the senior of the progress done to date and/or reporting any change in agent-like or strike-related activities. A report never serves the purpose of asking the agent's senior to handle the agent's problems.

SUMMARY AND COMMENTS

As stressed before, the individual circumstances of the target and the agent determine the extensiveness of the work done in each of the 12 steps and the time it takes to achieve the strike.

If the agent is required to return to the target area on several occasions to get the target info, he should always be observant of new developments and handle each new development as it arises. This may mean simply making a small adjustment in the plan of striking or it may mean a total halt of all agent-like activity until the agent is safely able to continue with the preparation steps and doingness of the strike. (As when the target begins to suspect the agent's activities and tries to protect itself from a strike).

Certain striking activities require more security than others. The agent must determine the degree of security he must maintain, as it is relative to his individual situation, in order to achieve the strike.

Whether a strike takes 15 minutes to prepare for or 15 months, the key to the whole game is observing what is really there, not what you were told should be there; and working on the basis of what you know.

END OF REPORT

Kathy Gregg
INT CH COMM
INT CHGO

3.) The infiltration of organizations that are enemies of Scientology by obtaining jobs under false pretenses or identification. The FBI discovered that Scientology's intelligence operatives regularly did this to obtain information and run covert operations on the targeted organization.

From personal experience inside Scientology for ten years I can unequivocally state that Scientology's thought reform programs have as one of their goals the turning of members into covert operatives for Scientology.[24] Members soon learned it was a great honor to be in the intelligence division of Scientology or be asked by its members to assist them with some covert operation against a Scientology enemy. While in Scientology, and now from the outside, I have seen this process at work time and time again.

Since detailed personal histories are assembled on everyone who enters Scientology, Scientology's intelligence division can access moles[25] who don't even know they are moles yet---the perfect deep cover intelligence mole. Scientology recruits its members from every walk of life, the police department, the government, the phone company, the military, the court system, etc. If these members have been through enough of Scientology's thought reform programs, and if they have access to something Scientology needs, they will be asked and recruited to use their positions, computers, or authorities to covertly provide whatever they are asked by Scientology's intelligence division.

The LA Superior Court and other court systems are particularly vulnerable to this infiltration by paid operatives who obtain jobs under false pretenses or who are recruited into Scientology after they are legitimately working in the court system. This infiltration factor does not even include the susceptibility of underpaid government workers to Scientology's other inducements to compel someone to do something for them.

The fanaticism of the Scientology's professional intelligence and covert operation machine presents problems that the normal security procedures of the justice system are ill prepared to deal with. As I found out the hard way during my trial, one can not assume that the evidence put into submission with the court, or the transcripts, will be there or unaltered when they are called for again. Never assume that false information has not been planted into supposedly protected court files after the fact.

There is now reason to believe that Scientology's secret infiltrations have spread and become more sophisticated. It is believed that Scientology operatives have infiltrated the ethics and governing boards of their major adversaries, the American Medical Association, the American Psychological Association, the American Psychiatric Association, the American Sociological Association, as well as the ethics and governing boards of the bar and judicial organizations in areas where they have frequent and important lawsuits.

It would not be unreasonable to suppose that Scientology's infamous "Snow White" operation (the master operation discovered by the FBI which sent Scientology's top executives to jail) was still in active operation. Its goal was (or *is*) to infiltrate all levels of over 100 branches of the U.S. Government that could harm or interfere with Scientology's growth.

---

[24] Also see appendix sections "Scientology's Actions Toward its Adversaries" and "Coercive Persuasion and Scientology".

[25] Intelligence terminology for a deep cover operative who exists within a organization and remains inactive possibly even for years until they are needed and then activated. Deep cover moles are very difficult to detect because they have behaved like loyal members of the organization, possibly for years.

Further reason to protect our institutions against Scientology infiltration comes from another type of strategy that Scientology repeatedly has applied to its adversaries and which permeates Scientology's operations. This strategy also comes from the bible of Scientology's intelligence division, "The Art of War."[26] In paraphrase:

> **Never attack the enemy's army -- particularly cities or fortifications -- if there is any way of avoiding it. The acme of war is to always attack the enemies plans first. In this way destructive battles and human and resource loss is minimized or averted long before they can ever take place.**

By infiltrating the offices and organizations of any perceived adversary or those organizations which influence or control the adversaries' ability to attack (state bars, medical boards, congress etc.) Scientology can subvert any plans of its adversaries which are not compatible with Scientology's interests before they ever get off the ground. That way it doesn't have to fight battles in "fortified cities."

4.) Impersonating a reporter to gain access as an operative and gain or plant information for Scientology.

The FBI discovered that a Scientology's intelligence operative had posed as a reporter to gain access to materials on Scientology collected by the Better Business Bureau.

Posing as a reporter is one of Scientology's favorite techniques, as was related to me by one of their top intelligence operatives while I was still in Scientology. In fact, I myself was sent to infiltrate the AMA at their Chicago headquarters using the reporter impersonation ploy.

Scientology used this tactic on me, with a paid operative in Aspen Colorado posing as a reporter to "interview" me and steal personal materials. This individual, and other operatives, then began a local black PR campaign of outright lies and distortions which destroyed my then existing business and eventually caused me to move from Aspen.

One of Scientology's other strategies, related to me by one of their top intelligence operatives while I was still in Scientology, was that it was acceptable to buy an underpaid legitimate reporter in order to kill a story on Scientology, mitigate it, or turn the story into an attack on one of Scientology's enemies. The impression I got was that it is far cheaper and easier to "convince" the reporter (i.e., offer more money than the reporter would usually ever see in a lump sum,) than risk having to spend or lose a fortune later on damage control or lost income. If the reporter refused the easy big money he could then be investigated for possible blackmail, or harassed.

---

[26] If by chance you become a possible target of Scientology's vindictiveness, I recommend you study this book until you know it cold. It will allow you to better defend yourself because you will be able to see the patterns and themes to the apparently random occurrences that might be occurring in your life. It will allow you to predict their actions and, more importantly, assist you in preparing safety precautions. Since it is my experience that Scientology first concentrates its efforts to discover and then to attack your plans, take the time to anticipate where it will occur and prepare against it.

The operative's goal is to make the resulting story, if any, conform to these points:

1) Positions that forward or legitimize Scientology's standard propaganda lines.
2) Positions that forward or legitimize Scientology's standard attention-redirecting enemy attack lines.
3) Positions that forward or legitimize Scientology's standard legal liability-limiting disclaimer positions.

Good legitimate reporters who have done their homework will not be tricked into ignoring all contrary facts and forwarding or legitimizing these enemy attack lines and disclaimer positions.

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

DEC. 6, 1968.

DEAR MO,

RE: INTELLIGENCE

THE FOLLOWING ARE POSSIBILITIES FOR COLLECTING DATA.

1. INFILTRATION.
2. BRIBERY
3. BUYING INFORMATION.
4. ROBBERY
5. BLACKMAIL

THE LAST TWO ARE, OF COURSE ILLEGAL.

INFILTRATION COVERS TWO METHODS - SOMEONE JOINING THE ENEMY WITHOUT THE ENEMY'S KNOWING AND SOMEONE, DISAFFECTING PRESUMABLY, TO JOIN THE ENEMY.

FOR GIVING THE ENEMY FALSE DATA, YOU CAN DO THE FOLLOWING:

1. USE INFILTRATOR TO SPREAD ALARM AND FALSE DATA.
2. SEND OUT FALSE DATA PURPOSELY.

LOVE,

PETER HOLLON

5.) Breaking and entering into the attorney offices of a critic or enemy. From confidential internal directives and actual covert operation documents, the FBI discovered Scientology's intelligence operatives had done this repeatedly. Among many instances they broke into and entered the homes and offices of numerous enemies and critics. The FBI discovered detailed training manuals on exactly how to "case" the target, break in through force or with lock picks, and create cover stories if caught.

A specific example of these tactics involves ex-Scientologists Robert Dardano and Warren Friske who testified to some of the activities they and others were involved with on behalf of the Church. These activities include the burglary of the Belmont office of a psychiatrist in order to steal files, the theft of documents from a Boston law firm, and the planting of a church member as a volunteer inside the state attorney general's office to intercept consumer complaints about Scientology.

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

9 Mar 75

VETTING HAT WRITE UP

PURPOSE: To clean USBI files of legally actionable evidence against the GO and its personnel.

Definition of `EVIDENCE' "4. in law, a) something legally presented before a court, as a statement of witness, and etc. which bears on or establishes the point in question; distinguished from testimony and proof....

[page 2]

1. Mentions or the ordering of a B & E.
2. Evidence that anything was stolen by one of our guys. (This does not mean someone else like PC saying we stole something, this means us saying we stole something).
3. Lines similar to `Here are the docs we got in our usual way late last night".
4. Implications of casing, including keeping checks on schedules and working hours as well as locks on doors etc.
5. Implications of posing as a Govt agent.
6. Evidence of tapping phone lines or illegal taping of conversations.
7. Mentions of harassment of an individual although not necessarily a full operation (so not sent to ops).
8. Any evidence of bribery.
9. Any mentions or recruitment of FSMs to be any kind of an agent. (This is Solicitation and a crime).
10. Also vet wordings like `this will get him' or lets 'wipe him out' or `this will be good for dead agenting' or we are `planning a covert op on him to handle him' or this will `strengthen our attack on him'.
11. Any mentions of entrapment setting up someone to commit a crime either directly or indirectly.

We must now vet every particle coming into CIC before it goes to the files. So when you send a particle to files be sure to vet it and label it with a red V in the lower right hand corner.

REMEMBER each particle does not need to be thoroughly read as you are vetting, scan it enough to be sure you would catch any of the above instances and go on. Any Questions, ask CICOF.

Love CIC OFF

The next 6 covert operation tactics are demonstrated in but, by no means limited to Scientology's "Operation Tricycle," the remarkably successful Scientology takeover of the City of Clearwater, Florida, which is described immediately following this page.

6) Forced detention of an enemy or critic. The FBI discovered that Scientology's intelligence operatives will take individuals against their will to detention areas and refuse to let them leave. This happened with Michael Miesner, a former member who later tuned states evidence for the FBI and help send 9 of Scientology's highest executives to jail. More recently, this has happened with many other former members who wanted to leave or were classified as security risks.

7) Staging a fake hit and run auto accident involving a pedestrian. FBI evidence showed that this plan had actually be executed in an effort to disgrace Gabriel Cezares, a former mayor of Clearwater Florida and Scientology critic.

8) Circulating false black PR stories. Mark Sableman, reporter for the *Clearwater Sun*, was critical of Scientology. The FBI discovered that Scientology's intelligence operatives circulated a rough draft of a fictitious news story using Sableman's name, alleging that 19 Florida legislators were linked to the Mafia, gambling interests, and were involved in bribery, blackmail, and illegal transactions.

   On July 15 1990, a *London Sunday Times* article revealed Scientology spent $200,000.00 or more to organize a worldwide Black PR harassment campaign against Russell Miller. Mr. Miller was a *Sunday Times* journalist and author of a Scientology expose, "The Bare-Faced Messiah."

   Dr. Margaret Thaler Singer has been a recent and ongoing favorite target. A dead rat with a stake though its heart was left on her doorstep. Her home has been vandalized, rats released in it, and some of her research stolen. En route to an educational conference on thought reform and cults, she was detained by British immigration police based on *an anonymous tip that she was a member of the IRA.*

9) Framing critics for lewd sexual conduct. The FBI discovered that Scientology's intelligence operatives had created a operation called "Priority A" to be done on Mark Sablemen. The plan called for a elderly Scientology operative from out of the area to go to the editor of the *Clearwater Sun* and accuse Sableman of molesting the operative's son. Episcopal Vicar Mike Rokos had stories broadcast that he was a convicted sex criminal.

10) Framing a critic as being connected to organized crime. The FBI discovered that Scientology's "Priority A" operation also called for a Scientology operative to go to the editor of the *St. Petersburg Times* and deliver an envelope with $100 cash in it for Betty Orsini, (a newspaper reporter critical of Scientology.) The operative was to say that the money was from a well known mobster in return for information Orsini had supposedly passed to the mobster.

11) Burglary and theft. The FBI discovered that Scientology's intelligence operatives had burglarized the offices of lawyers for the *St. Petersburg Times*.

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

SECURITY OF THE OPERATION

The first consideration on security is always the personnel chosen to do the job. Professionals would usually choose someone who is confident and competent, easily trainable and fully trained. In other words in Scientology terms, people who are not PTS, who are not ethics cases. Additionally one would normally choose someone who is motivated by duty or other high motivation to prevent later sell-outs or discovery by reason of an agent turning...

SECURITY OF THE ORGANIZATION

Professionals are always working for some person or group which for the purposes of this section will be referred to as an organization. If the agent's motivation for working for the group is high, then this section will concern the agent as well.

Any professional intelligence group has to confront the possibility that at some stage an agent will be picked up. The most serious of these is when the agent is picked up in the actual act of stealing documents or in position where he is about to steal documents, or has just stolen documents and is moving to his base with the material. Therefore agents are frequently given instructions along the lines of "if you are picked up by the police, don't say anything more than you are required to by law", which is usually your name and address but this varies depending on the area. This is of course if the agent is in a position where no story would explain the outpoints confronting the police. The agent will probably be arrested at this stage and should quietly arrange a lawyer through a law society or legal aid society. Such societies abound these days and a name and address of one can be memorized beforehand.

The organization usually arranges some method of communication so that the agent can tip them off that he has been picked up. Any organization that has a desire to retain its agents or to continue recruiting agents, usually has the sense to provide bail through some bail bond system that allows the organization to remain anonymous, pays any legal fees incurred and gives every possible moral encouragement.

Additionally, any agent working on such operations would have nothing in his possession that connected him with the organization, nothing at his home address that connected him with organization and no possible way of tracing him back. For example, an alternative employment or no employment, but certainly no mention of employment by the organization. This is the usual exchange between agent and organization in the event of an arrest. The agent protects the organization, the organization assists the agent in every possible way. Such preparations are also usually made well in advance, so that the agent's recent history does not show any connection with the organization.

COVER STORY

One trick used by professionals is, after the casing has been completed and the plan decided on, a series of cover stories are mocked up to cover each stage of the operation in the event that the operation is blown at any point. Such cover stories usually relate to the most vulnerable state of operation. For example, an agent might prepare a story as to why he was in that particular neighborhood, why he was on that particular street, why he knocked on that particular door, even what he was doing in that particular backyard. Thus if he is picked up at any of these points he has a plausible explanation as to what he is doing.

On occasion cover stories are mocked up to cover being caught in the act. It is sometimes to the advantage of the agent and the organization, if the police believe that the agent was actually breaking in for money or goods, rather than documents or files, as the police have a common R with criminals who they can duplicate, but sometimes get frantic when confronted with intelligence operations. Such cover stories as mentioned above would also be designed to handle the local security guard, the local resident or staff member or whoever discovers the agent in the beginning stages of the operation...

Distribution

DG US DDG US
DG I US &
BI US & BI Base as
OK'd by DG I US

POWER PROJECT 4: TRICYCLE

Ref. GO Orders 261175 LRH "POWER"

Target 3

PROJECT INFO: This project follows HCO PL Targets Defense "If we unite all groups into an interplay and use all forces extant and channel them we have a very big chance of winning" "SO we can and must take the lead." "And we ourselves must develop many leaders."

MAJOR TARGET: To proof up ourselves against any potential threat by taking control of the key points in the Clearwater area.

VITAL TARGETS:

1. Any obstacles or opposition to these targets that arises must be removed to the point of no further threat or barrier to obtaining the Major Target.
2. Do not depend on or wait on other collection targets for these research targets.
3. Excellent security must be established and maintained on this project throughout all stages but must not stop the progress of this project.

PRIMARY TARGETS:

1. AG 1 Base and Ops Officer Base are responsible for this project.
2. Utilize any existing data for the selection of your targets.
3. ODS Officer responsible for recruiting (with help from B1 US), planning and running of agents.
4. Finances for transportation and initial support of agents for this project are to be arranged by the AG 1 Base in liaison with the AG F Base.
5. Regular reports are to be made to US, WW and CS-G.
6. Those concerned are to M4 star rate this project and HCO

PL. Targets Defense.

OPERATING TARGETS:

1. List out all news media and the heads or proprietors of news media that are distributed or broadcast in the Clearwater area.
2. Look for any one group or place where all heads of media in number 1 above come together.

No number 3 listed.

4. Work out a way to gain (B1) control or (PR) allegiance of each media head or proprietor (beginning with those found in target 3 above).

   (Note: Control can mean buying the media or controlling interest or it can mean holding a powerful position with the media). Submit a targeted take over project to DG I US for approval.

5. Implement approved handling when received.
6. Locate key political figures (ones who influence the area).
7. Work Out a way to get control or allegiance of each. Submit final project to DG I US for approval.
8. Implement approved handling when received.
9. Locate the key financial influences in the community.
10. Work out a way to gain control or allegiance of each. Submit final project to DG 1 US for approval.
11. Locate the people and groups peculiar to the Clearwater area which exert the greatest control/influence in the area (possible example - Board of Realtors).
12. Work out a way to gain control or allegiance of each. Send projects to DG I US for final approval.
13. Implement approved handlings when received.

DICK WEIGAND
DG I US
FOR
HENNING HELDT
DG US
FOR
MO BUDLONG
DG I WW
FOR
JAN KEMBER
GUARDIAN WW

RE: CHINA SHOP: CLEARWATER SUN

Dear Dick,

Here are some observations and data on Clearwater Sun recently received;

A study of the paper does not show a political or intelligence angle. Only evidence that the paper attacks everyone. Any Good News is converted to attack. This paper (Clearwater Sun) may influence the two other papers that have offices in Clearwater (St. Petersburg Times and Tampa Tribune, believe) or those two influence the Sun.

The only conclusion that can be drawn is that somewhere in the editorial structure they have an institutional case - a has been one or a should be one. For it a characteristic of insanity to attack everything.

JOHN E. RICKETSON:	PUBLISHER
AL HUTCHISON:	EDITOR & GENERAL MANAGER
RON STUART:	MANAGING EDITOR
TERRY PLUMB:	ASSOC EDITOR
MIKE PRIDE	CITY EDITOR (per Sableman)
MARK SABLEMAN:	WRITER
ALSBURY:	WRITER
NORMAN MORGAN:	WRITER
STEVE SNOW	WRITER
CIRCULATION	30,000
AD SPACE:	Not spectacular
FINANCE ESTIMATE:	Not so hot (their finance condition)
OWNERS (per Sableman): (and B-1 Msn)	JEFFERSON PILOT CORPORATION (OF GREENSBOROUGH, NORTH CAROLINA

Our target On this, very confidentially, is ownership or control of the paper. So, as you know, the finance information. on the paper, its debts, its income (and how it could be cut) are prime information needs. Also detailed info on the posts of the staff editors, etc.

Love,

Henning
DGUS

HH/bc

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

DDG US
DG INFO US

RE:PREDICTION IN CW
Yours of 10 March 76

Dear Duke,

You asked for a chart of enemy lines used up to this point for CW (Clearwater) attack after research of the files was done.

Attached is this chart. It looks complete to me.

From this I see the areas of priority to Infiltrate are:

1. SPT (St. Petersburg Times)
2. Mayor
3. Channel 13 TV
4. Snyder
5. Florida Attorney General Florida State Attorney (Russell)

As things have been quite hectic with me the last two days I wanted to send this to you to go over. Any changes or additions you want to make would be fine.

DM/mw

Tactics 12, 13 and 14 will be demonstrated in reference to "Operation Freakout" against journalist Paulette Cooper. The matter of Paulette Cooper was still unresolved at the time of the FBI raid on Scientology headquarters in Los Angeles, and documents describing her handling-to-date ("Operation Freakout") were there to be seized. Some of them appear following this page.

12) Attempting to get a person incarcerated in a mental institution. The FBI discovered that Scientology's intelligence operatives created and began to enact an operation called "Operation Freakout" whose purpose was to drive Paulette Cooper insane and then into a mental institution.

13) Impersonating a person to frame or discredit them. The FBI discovered that Scientology's intelligence operatives planned to impersonate Paulette Cooper, go to a Laundromat, and threaten to kill the President. A second intelligence operative inside the Laundromat would tell the Laundromat personnel to report the threat to the government.

This chilling example involves Paulette Cooper, the author of "The Scandal of Scientology." The Church's response to Cooper's book is detailed in a document describing "Operation Freakout" which was designed to *"get PC incarcerated in a mental institution or jail, or at least to hit her so hard that she drops her attacks."*

Cooper, who says she was served with 18 lawsuits against her by the church, had a nervous breakdown after someone sent Scientology a bomb threat on her stationery. She was cleared of all charges after the 1977 raid which uncovered Scientology documents documenting the frameup.

In a section titled "VITAL TARGETS," the document "Operation Freakout" gives specific details of the harassment program against Cooper. Such actions include an obvious attempt to impersonate Cooper, with directions like: *"To recruit an FSM (Field Staff Member) that looks like PC...," "to get familiar with PC to find out some of the clothes she wears particularly what sort of coat she usually wears...," "To get a cheap coat that is very similar to PC's." "To have someone available to steak (sic) out PC when she leaves her place the day of the caper, to ascertain when she leaves, what she's wearing, etc.," "Obtain wig that looks like PC, so that FSM PC can wear it during caper,"* etc.

Further details of "Operation Freakout" describe framing Cooper on a bomb threat against two Arab consulates in New York City. A further memo dated 13 April 1967 regarding "PC Op Freakout" states, *"The FBI already think she really did do the bomb threats on the C of S."*

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

1 April 1976

OPERATION FREAKOUT

MAJOR TARGET:

To get P.C. incarcerated in a mental institution or jail, or at least to hit her so hard that she drops her attacks.
PRIMARY TARGETS:
US B1 NE SEC working in liaison with OPS NAT if needed.
To remove PC from her position of power so that she cannot attack the C of

---

RE:

Dear Dick,
SITUATION: Copper is still not terminately handled.
DATA: Cooper is
Attached is approved Op Freakout. This additional channel. Should really have her put away

The FBI already think she really did do the bomb threats on the C of S.
SOLUTION: OK this additional Channel.

This is OK ________________
Approved ________________
Disapproved ________________

Love,

Randy

OP FREAKOUT

OPERATING TARGETS:

CHANNEL 1:

~~1) Telephone call PC to ascertain if she is home alone. She must be home alone.~~

AG I NY

2) When she has been found alone, telephone (during the work week) 2 Arab Consulates in NYC, from telephone booth nearest PC's place. Telephoner should be a girl that

sounds like PC and the call should be fast, to the point, and impinge. It should go as follows: from a totally trusted non staff member.

"I just came back from Israel (pronounces the way it is pronounced in Israel) I've seen what you fucking bastards do. At least you're not going to kill my sister. I can get away with anything. I'm going to bomb you bastards. Say something in Jewish/ swear or mumble something Jewish.

AG I NY

CHANNEL 2:

1) Obtain a copy of Writer's DIGEST - a writer's magazine - (if not available get any writer's magazine.) person who obtains this magazine should be disguised in some way and not traceable back to the org. Don't order the mag. by mail. One should easily be found on the newsstands or in "back issues" stores.

AG I NY

2) Obtain the latest promo of the T.M. (transcendental meditation) that PC is going to, same security as above.

AG I NY

3) Cut out "letters" from both of the above publications. Include "CAPITOLS". Arrange the letters, pasted, on a clean piece of paper (not Org paper) If there is a blank page or nearly blank page in the writers magazine, use it, crossing out in ballpoint anything written on the page. Paste or glue the letters so that they say the following:

"All of you are distroying Isreal. You're just like them. My sister lived you basterds. I was there - I saw the wonderful people. Nobody can touch me. I'm going to kill you basterds. I am going to bomb you. Kissingger is a traitor. I'll bomb him to. It makes me very sick. I must meditate. You are spying on me even in Isreal. Your day will come soon. I'll expose you and bomb you."

Go to library and type out the name of the NY Consulate and address of the Nation that is most anti Isreal (attacking it). (No prints) Use "Capitols" on the envelope.

4) Place "letter" into the envelope, seal, and mail from the mail box nearest PC's place.

INSURE SECURITY / NO PRINTS on any letters, envelope, or paper, or stamp.

INSURE no paper from AG Office or Org is used.

Entire action should be done out of the Org.

NEED TO KNOW strongly inforced. PR, Communicater Legal should not know. Max should do this entire action.

If in doubt about "did my prints get on anything" throw everything away and start fresh.

CHANNEL 3:

1) FSM in VT # 3 telephones and makes a definite appointment with PC. Sometime when the laundry (in VT # 12) is open. The place should be a restaurant or bar/ one of the purposes of this action is also to get PC drunk.

AG I NY

2) FSM above meets with PC.

AG I NY

3) Stakeout FSM (see VT # 8) communicates with Case Officer and PC Double FSM (see VT # 1) and alert the former what PC has on, how her hair is arranged, does she have her usual coat on etc.

AG I NY

4) "PC FSM" changes to the closest clothes they have, matching PCs. If PC has on blue Jeans/ change to Blue jeans. If PC has on her usual coat put that on. (see VT # 3 and 4) What ever PC usually wears (a favorite sweater etc.) a yellow dress, blue, green etc. sneakers, a yellow scarf etc. should be had by PC FSM ready to change into. In other words several different out-fits should have been obtained by PC FSM, so that when the caper goes down, she can immediately change into the color or type of outfit that PC has on.

From the observation of the stakeout FSM --- to the change of PC FSM's clothes, only 3 minutes should have gone by. If PC let us say has her hair up, FSM puts her "hair up" very fast it doesn't have to be a good job/ just so it's "up".

AG I NY

5) PC FSM goes immediately into the laundry and does the following caper. (wearing sunglasses) This is done immediately, so that PC could have done it on her way to meet the FSM or FSMs for drinks.

(Patter/ PC FSM goes into laundry. Acts very confused. Says "I'm P.C. Do I have any clothes here? Clerk says no FSM demands clerk checks. Clerk comes back. Says no again. FSM screams You're crazy, my name if PC, check again! When clerk says no or whatever he does, FSM goes PTS 3/ You're one of them! I'll kill you. You're a dirty Arab. You fucking basterds. I'll bomb you. I'll bomb the Arabs. I'll bomb the President. I'll kill that traitor Kissingner. You're all against me."

If an Item of PC's clothing was obtained at TM, FSM leaves this on the counter or drops it on the floor.

FSM

6) PC FSM leaves laundry immediately, turns the corner and gets into "pick up" car. Takes off "PC's coat" Wig or whatever. Changes her looks fast.

FSM

7) Mean while, immediately after PC FSM leaves laundry, observation FSM (see VT # 2) asks laundry clerk if they do Suede cleaning and also says, Boy was she crazy! real casually says I think you should call the police with all these nuts threatening to kill the president FSM leaves. FSM should be disguised and not work on staff.

FSM

8) FSM calls from a phone about 5 blocks away, the FBI and says that she/he doesn't want to get involved and doesn't want to give her/his name but some nut girl in (the name of laundry) just went crazy and threatened to bomb the place and kill the president. With all these nuts running around I thought you should know. The guy in the laundry heard her too." HANGS UP, and leaves immediately and gets out of there. This call/ the FSM's voice should be disguised. All these type calls are tape recorded. (FSM should not be told this; just to disguise her voice.

FSM

PRODUCTION TARGETS:

CHANNEL 1: Should be done within 2 days of receiving this project.

CHANNEL 2: Should be done the day after the above channel is done.

CHANNEL 3: Should be done within 1 week after the above channel is done. (and when other FSMs can get an appointment with PC

[**handwritten**] ***CHANNEL 5 10 days after channel 3 is done.***

Love,

Puck

CHANNEL 4:

1) Do not tell "Pin Ball "FSM or TM FSM about this OP, but alert them to immediately report any thing PC tells them. Have them try to speed up their relationship with PC, for feed back purposes. Get feedback on this op. (cleverly)

AG I NY

CHANNEL 5:

1) Wait 10 days after the completion of CHANNEL 3. If nothing has accrued from feedback, on PC. Then have the following action done:

FSM Female disguised voice, calls the Arab Consulate and asks for the Press "attaché". talk through a piece of thin paper covering the mouth of the phone. This will be tape recorded but don't tell FSM on this. FSM says crying to Attaché:

5) cont.

I just want to tell you there is someone a writer by the name of PC, who recently came back from Israel. She works for Israel Intelligence. She's also insane. She was in a Concentration Camp in Nazi Germany. She's been seeing Psychiatrist for years. Her sister is also with Israel Intelligence and lives in Israel. She talks when she high on drugs or drunk ***[handwritten] Lately she's been talking about bombing your embassy. I hate the damn Jew.*** FSM hangs up and leaves fast.

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

[handwritten] op Freakout 2:
No prints!!!!

Additional channels on Op Freakout. (Lovely)

1) When TM or Pin ball FSM meets with Lovely, they get drunk! Another FSM male, has a funny typed out joke. One of these full page sexy jokes. It has a plain white cover on it - a plain typewriter sheet. FSM has 2 copies of this. He shows one copy all around the bar, obviously so that lovely and FSM can see him doing it. Then drunkenly comes over to FSM's table and wips out "joke" to show FSM. Both FSM and "drunk" are careful not to touch plain sheet. The 2 sheets are folded as if to be mailed. When drunk picks up joke again, he whips it up by its corner and puts it in his long open wallet or puts it in his hat that he should be wearing for that purpose. If the hat is used, "drunk" goes into the bathroom and carefully puts "joke" into his wallet. Drunk is always acting the fool. Drunk leaves.

FSMs

2) Drunk takes sheet with Lovely's prints to AG I being sure to get no prints on it.

Drunk FSM

3) Write the following letter on a library typewriter and address the envelope to Kissinger in Wash. DC on the same typewriter. (absolutely no PRINTS.)

3) cont.
You are a traitor to your people YOU BASTERD. I've been there and seen what you have done. You're ONE OF them. I"M GOINg To KILL you I"M going to BOMb YOU. I have connection.NObody Ca n touch Me. You arre a German Pig. You Should be in THe Concentration CAMPs. I Feel So Ill Because OF YOu And YOu GodDam PIGs. YoU Die SOOn. It IS a Phalic SYMbol. I ThinK TrAnsFeranCe. EPidus The BOMB Is S ET TO gO. MY Sister ISRE A L. ThEy Are Responsible . They Persecute Me I W iLL Kill THem AND YOU. YOU are All Aga inst ME.

The above letter should be typed onto the blank sheet obtained in #1.

AG I NY

4) Mail the above, from the Mail Box nearest Lovey's place.

AG I NY

[handwritten]

5) If the above 1 and 2 don't work out for any reason, Do the same action at T.M. with Lovely and TM FSM.

AG I NY

13.) Sending bomb threats and framing someone else for it. As mentioned above, the FBI discovered that Scientology's intelligence operatives had stolen Paulette Cooper's stationary (with her fingerprints on it), then typed bomb threats on that stationary, and sent them to Henry Kissinger and to Scientology itself. Scientology then called the FBI after receiving the bomb threat it had sent to itself and gave Paulett Cooper's name as a suspect.

The "Operation Freakout papers date from some years ago. Former Scientologist Valerie Stansfield addressed the question of whether Scientology had cleaned up its act, in a televised interview with the British Broadcasting Company (BBC) in the mid-1980s -- *after* the Guardian's Office had been replaced by the Office of Special Affairs. Her statement:

> "It's worse. I know this because people have come to me, continuously, and bring me the stories of the horrors they're going through, in present time, up to even a few weeks ago. The Church has a history of every time they're called to account they say `that was in the past, we've dismissed those people, we don't do that any more.' It could be called a catechism of the Church, `we don't do that any more.' *They do it. And more. They'll do it as much as they can get away with.*

Read the following pages and think about the intimidation and other influences which make it so very difficult to speak out. Is it still going on? Is there realistic cause for extraordinary diligence when dealing with Scientology? Examine the evidence and you be the judge.

[FROM THE WOLLERSHEIM CASE]

Standard police report
MILWAUKEE POLICE DEPARTMENT

District No. Seven

REPORT Saturday, July 28, 1984

In the matter of Possible Threats by a Religious Group

To Thomas E. Harker Captain of Police

Sir:

On Saturday, July 28, 1984 at 1:45 am, I was dispatched to meet a citizen at 3277 N. 96th St., for a threat complaint.

Upon arriving at the scent, I interviewed the complainant, Lawrence D. Wollersheim, w/m, 7-02-21 of 3277 N. 96th St., Ph. #462-1996. He is the owner of the Steak & Stein Restaurant at 5930 W. North Ave., Ph. #771-1990. On this date, Mr. Wollersheim related the following to me. He stated that his son Lawrence D. Wollersheim, w/m, 11-16-48, is currently living in Aspen, CO, Ph. #303-925-6356. His son had been a member of the Church of Scientology sect for 13 years. This religious group is based in Los Angeles, CA. His son is currently no longer associated with this group and is suing the sect for 25 million dollars. The law suit must come to trial by July 1985 in the California court system.

Since Mr. Wollersheim's son has filed this suit, he has been harassed and threatened by members of the Church of Scientology. He has been visited as recently as Wednesday, July 25, 1984 at which time they made threats against him, his family and the President of the United States. Mr. Wollersheim's son had been a high ranking member of the religious sect prior to his leaving. While in that high position he learned many of the inner dealings of the group. For this reason they are attempting to force Mr. Wollersheim's son to drop his suit. The religious order supposedly has its own security personnel to use such tactics as threats, intimidation and harassment in order to eliminate any outspokenness by members or former members of this sect.

Mr. Wollersheim Sr. stated that on Wednesday, July 14, 1984 a pipe with wires protruding from it was found lying on his front lawn. At that time the police were summoned and Squad 75, P.O. John Bogues responded. The bomb squad was notified and the device was determined to be a device made to be to look like a bomb. Mr. Wollersheim believes that this was a form of intimidation that he attributes to the religious sect. He states he has also received numerous harassing phone calls from unknown callers which he also attributes to the religious sect. Mr. Wollersheim stated that as the court date nears the harassment will increase. His son has told him that this is the usual practice of the religious sect's security forces.

Mr. Wollersheim requested that the squads in the area pay particular attention to his home for any suspicious persons. I advised Mr. Wollersheim to contact the telephone company for the purposes of having a tracing device placed on his telephone in order to learn who is making the harassing phone calls. I also advised him that the squads in the area would be notified to pay particular attention to his home.

Respectfully submitted,
(signed)
Gary R. Bruhn
Police Officer
District #7 - Late

["7th DISTRICT RECEIVED" stamp is signed (illegible) and dated JUL 28 1984.]

14) Confidential materials, disclosures, or confessions given to Scientology by members are routinely used to blackmail, silence, or intimidate that individual if that individual should leave Scientology and becomes critical of Scientology. From confidential internal directives and actual examples the FBI discovered that Scientology's intelligence operatives regularly use or make public confidential information and confessions of former members in an effort to silence them.

In my own personal experience, I had my "confidential" auditing confessions *used in court* by Scientology as well as material from them repeated to me in anonymous harassing phone calls. Scientology's twisted use of confidential disclosures made to them has also been further verified in ongoing court cases with other former members.

Anyone who is a member or former member os Scientology, who has ever given any information to Scientology, is at continual risk of having this information revealed. If you are a former member every effort should be made to obtain all your Scientology records and **all copies of them -- because Scientology has time and time again proven itself to be totally untrustworthy. If you know someone who is a member they should be made aware of this history and encouraged not to trust Scientology with any personal information or any supposedly confidential confessional material under any circumstances.**

Because of the way Scientology is "compartmentalized," lower-level personnel usually do not know the true motives and activities of the organization. Those who administer the hypnotic thought-control techniques normally are misled about what they are really doing. The following evidence comes from Scientology's (upper level) intelligence sections, not from their (lower level) pseudo religious sections.

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

To: .... illegible ... 13 Jan 77

cc: DGI US via DGI C

Excerption of Ira XXX PC files

Dear Cindy,

Here is the pertinent data from Ira's pc files. This includes data from TT done earlier and me going through about 1/2 of his lower level files which is at the end of this excerption.

First session. TA range 1.7 - 1.8: less than 1 div TA in the session. Ira wished to be a better "fuck" - "likes" Mike Lyles (MWH) This session was on 10 Dec 69..(Pg. 1,1)

14 Dec 69 - ARCX with Victor _____ who's antagonistic to Scn. M/W/H, had sex with a prostitute before marrying Holly. (Pg. 1,2)

19 Jan 70 - white form done (2ond one) SF on "here on own determinism". (Pg. 1-3)

20 Jan 70 - on R3R Ira runs an incident where he hit a man from behind with a car in 1968 or '67. (Pg. 1-4)

27 Jan 70 - M/W/H, Ira gives up that he attempted to strangle old girl-friend, Lynda. TA range 2.1 - 1.8. Total TA 1.2 divs. (Pg. 1-5)

6 Feb 70 - 3rd white form. SF on "here on own self determinism". (Pg. 2-1)

23 Feb 70 - Ira says he'd leave the SO if it came down to 2D vs 3D. TA range 2.5-1.9 Total TA: 1.1. (Pg. 2,2)

23 Mar 70 - MWH Ira gets off that he and a friend gave each other blow jobs when he was 11 or 12. Ira gets off that he, his wife Holly, and Mike Lyles had a 3 way thing going in Chicago with all of them in bed at the same time. (Pg. 3,1)

13 Apr 70 - 4th white form: Ira gets a fall on "here on own self determinism". (Pg. 3,2)

1 Oct 71 - MWH. Ira saw a lady psychiatrist when he was 20 - he gets off that he successfully W/H this on a sec check so he wouldn't get routed off staff. (Pg. 3,3)

10 Jan 72 - Ira claims that he has no service fac, he then F/Ns. Total TA for session was 2.2 divs. (p.4,1)

8 Aug 72 - List corrections get read on "doing s/t with mind between sessions". (Pg. 5,1)

9 Aug 72 - Exec Series 12 item "masturbating", mentions High School friend, David Schiff, as homosexual partner, used to masturbate 3 times a day, says "If Yvonne caught me masturbating, I would blow Scn", lived with Mike Lyles, Holly (his wife) and himself as trio. They all slept together and took turns with Holly, some activity between Ira and Mike. (Pg. 5,2)....

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

GUARDIAN ORDER

GO 121669 MSH December 16, 1969
To: All D/A/Guardians for Intelligence

PROGRAMME: INTELLIGENCE: INTERNAL SECURITY

OBSERVATION: The enemy has used the method of infiltration to obtain information against ourselves as known from incidences in South Africa, Edinburgh and Washington, D.C.

The enemy has also "turned" and used as double agents Staff members as revealed by Maurice Johnson at Saint Hill and Barbara Peake in Melbourne.

Further, the enemy has used former disaffected staff members, Scientologists Or relatives of Scientologists in their attacks - Philip Wearne and Doug Moon in Australia, Jean Kennedy and Gene van Niekerk in South Africa, Michael Pernetta and Mrs. Henslow in England, Eleanor Turner and the former Mrs. Elmo Troup in America and the O'Donnell family in New Zealand, to name but a few of the outstanding examples.

Although infiltrators and double agents can create more internal Chaos and disorder in an organization, the enemy has been most successful in their attacks through the use of disaffected staff, Scientologists or relatives of Scientologists and the biggest gross error an organization can make as regards its own security is violations of the HCO Policy Letter of October 27, 1964, "Policies on Physical Healing, Insanity and Potential Trouble Sources".

The duty of keeping the organization secure belongs in the HCO Division, both in RAP and Inspections and Reports, but the Intelligence Bureau has learned through long experience that it cannot leave this function entirely up to HCO and where it has done so, it has had to suffer the consequences. Thus this Programme is a vital one.

MAJOR TARGET: To use any and all means to detect any infiltration, double agent or disaffected staff member, Scientologist or relatives Of Scientologists and by any and all means to render null any potential threat or harm such have rendered or might render to Scientology and Scientologists.

VITAL TARGETS:

1. This Programme is to be done by the Asst. Guardian or the D/A/Guardian for Intelligence, if this post is held separately.
2. To establish Intelligence files on all such persons found to be infiltrators, double agents, and disaffected staff members, Scientologists and relatives of Scientologists.

OPERATING TARGETS:

1. **To make full use of all files on the organization to effect your major target. These include personnel files, Ethics files, Dead files, Central files, training files, processing files and requests for refunds.** (emphasis added)
2. To assemble full data by investigation of each person located for possible use in case of attack or for use in preventing any attack and to keep files of such.

3. To be alert to usual security precautions and to see that these are performed by the organization; such as proper locking of the premises, security of keys, locking Of files, the changing Of locks if keys have been lost, proper safes, etc.
4. To keep off staff and off org lines any person who has ever betrayed Scientology or who has threatened to betray or blackmail Scientology.
5. To ensure the Policy Letter on Physical Healing, Insanity and Potential Trouble Sources is not violated and to be alert to any possible violations.
6. To maintain a good liason line to Ethics and ensure that the Ethics Officer alerts you to any person who might attack Scientology.
7. To be alert to any organizational theft or disappearances of records and files as a possible indication of the presence of an infiltrator or double agent. Infiltrators are frequently those who have recently "joined" Scientology and so can be watched. Double agents are usually detected by natter, down stats, disorder in their areas and no case gain.
8. To be effective and imaginative in your collection of data and in your actions to nullify any attack or threat of attack.
9. To keep your Asst. Guardian fully advised and the D/Guardian for Intelligence WW, who will inform the Guardian WW in such matters.

PRODUCTION TARGET: This is a continuing Programme on which Projects will be issued from time to time.

Mary Sue Hubbard
CS-G

15) Infiltrate the court system to alter and steal documents and files before, during or after court rulings. Any individual or attorney who goes into court with Scientology must never assume that any evidence you have submitted has not been stolen or tampered with. *Check every copy against its original.* Any document Scientology submits must be examined carefully for authenticity. It could be what they call a "history rewrite" or a manufactured document.

There is a "coincidence" that occurred during Wollersheim's 6-month trial which helps make this point more clear. It has the attempted precedent-limiting intelligence signature of creating and rewriting "history" all over it.

During one lunch break in the emptied courtroom, while the evidence exhibits were apparently not being guarded, someone altered Dr. Margaret Singer's notes on her interviews with Wollersheim to read that I had taken 300 LSD trips before entering Scientology. (Dr. Singer was the expert psychologist testifying on my behalf.) The document was remembered to not have this on it when it was entered into evidence. When Dr. Singer verified by phone that no such event occurred and that she never wrote such a statement in her notes, this incident created a flurry in the courtroom.

Out of court, things are not much different. Never assume their lawyers will send you the same documents they submit to the courts and never assume Scientology's lawyers will notify you at all when they initiate some action. Always keep checking the court docket yourself on a regular basis.

16) Possible Scientology involvement in conspiracies to commit murder or commit assaults.

An informant, in a sworn statement given under oath, told of a plan to harm or kill Cynthia Kisser, Executive Director of the Cult Awareness Network. Reportedly one suggested method was to cut the brake lines in her car. Attempts were made to menace a Catholic priest, Father Kent Burtner, who is also a supporter of CAN.

Michael Flynn the Boston attorney who represented ex-scientologists against Scientology had to make an emergency landing in his plane. It was later discovered that there was water in his fuel.

Charles O'Reilly, Wollersheim's attorney, was mysteriously pistol whipped by an unknown assailant the night before he had to argued the Wollersheim appeal at the California Appellate court. Even more coincidentally, on that very same night, drug paraphernalia was planted in O'Rielly's home.-- conveniently fitting in with Scientology's false black PR drug abuse campaign against O'Rielly

The appendix "Scientology's History of Criminality" contains an affidavit by former Scientology insider Steven Fishman in which he describes a conspiracy to commit the murder of Lawrence Wollersheim. A second affidavit regarding another conspiracy has been recently received from another source.

SWORN STATEMENT

I, Malcolm ClaudeNothling, the undersigned, hereby state the following under oath:

1.) I am a Caucasian male 38 years of age, born on 31/08/54.

2.) I was a dedicated member of The Church of Scientology from 1979-1986.

3.) I served in the Special Forces in the South African Defense Force. During this period I became highly skilled in handling firearms. This information was known by senior members of the Church of Scientology in South Africa.

4.) In May 1986 I was requested to take up an administrative position at the Church of Scientology's headquarters in Los Angeles.

5.) I arrived in Los Angeles on 6th Jun. 1986 expecting to take up an administrative post that urgently needed to be filled. A week after arriving I was seconded to assist with demonstrations outside the Los Angeles Supreme Court in which he case between Lawrence Wollersheim and the Church of Scientology was being heard.

6.) I was also promised by the Church of Scientology, on arrival in Los Angeles, that they would attend to some of my previous counseling that had gone horribly wrong. I was experiencing suicidal feelings and feelings of anger and destruction. It required a tremendous effort on my behalf to restrain myself. I had previously submitted a report to the Religious Technology Center of my condition.

During June/July 1986 I was approached by two Scientologists from the San Francisco area, specifically Concorde. Unfortunately I cannot recall their names but one of them had a sign writing business in that area. They proposed that I should assassinate Larry Wollersheim. They would organize the weapon and whatever else I needed to accomplish this task. I cannot say with any accuracy whether or not they had been instructed to organize this from a higher level within the organization. However, I now find it disturbing that Scientologists, myself included at the time, can consider this method of resolving what they *consider to be a problem. In fact I blame the policy within the Church of Scientology known as the "Simon Bolivar" which encourages these acts against supposed enemies. At the time I seriously considered committing this crime but believed that I was going to be used as the "fall guy" because it would have been easy thereafter to show that I was demonstrating and stating that I found myself in an unstable condition. When I declined I fell out of favor with the Church of Scientology and was expelled without a hearing and on trumped up charges for which I am currently suing the Church of Scientology.*

8.) The above is true and I am willing to submit to a polygraph test or any other method to establish the integrity of my statement.

(His signature and notary signature appears here.)

A high level Scientology intelligence director, who has since defected, told me about a favorite technique of Scientology's intelligence people. They set up one of their own expendable people, make them look crazy (incriminating affidavits etc.) then disavow them and let them act out the original covert operation plan, perhaps in desperate hopes of regaining favor with the group. But now, because the person was kicked out by the group, Scientology has a pausable story, that the "disavowed" individual was a renegade acting on his own.

In this case, I believe Malcolm was this expendable person but didn't realize that he was being set up until later. It is not at all out of character that Scientology went to him through nebulous third parties for the assassination. They have detailed personnel records (sequential job histories and skills) on everyone that comes into the organization. They knew Malcolm had the Special Forces skills to pull this off. They fed the info to outside operatives to blur the direct connection to them, and had those operatives try to set up Malcolm to do the job after they had set up their alibi on Malcolm.

DETAIL - PART TWO

DOCUMENTATION OF SCIENTOLOGY'S ADVERSARIAL TACTICS

SCIENTOLOGY AND ITS NEW PRACTICE OF "LEGAL" BRUTALITY

"Legal" brutality is the deliberate orchestration of numerous different actions designed to make execution of the justice process impossible. They are tactics designed to punish, obstruct, delay, intimidate, stop the proceedings, or to deliberately create a mistrial.

These tactics are used when Scientology is reasonably certain they are going to lose the case and especially when they want to prevent an adverse precedent from being established. These are the tactics of losers and spoilers.

Scientology's main defense, besides its asserted First Amendment religious immunity defense, is to rely on pounding its adversaries into inaction or flight by wearing or breaking them down -- to overwhelm and introvert them through complexity and confusion. One hundred suits have been filed against the IRS alone. In early 1993, more than thirty were pending against the Cult Awareness Network and individually against certain of its personnel.

This overwhelm, confuse, and introvert tactic also shows up *in the courtroom* where Scientology uses three, four, sometimes as many as seven different criminal lawyers[27] from different firms to simultaneously hammer, intimidate, and bully the judge, jury, witnesses, court staff, security people and prosecutors. They use near-continuous objections, gallery interruptions, and other miscellaneous non-procedural efforts, often to set up their own grounds for mistrial or appeal.

Their attorneys and their in-courtroom gallery operatives deliberately create an atmosphere of intimidation and fear. Everything and anything is done to increase their opponent's expenses and to delay and obscure the proceedings.[28]

This Scientology-style "legal brutality" is not a search for justice but reminds one more of the strategies of coercive persuasion used to break down of prisoners of war by constant psychological coercion, intimidation, and stressful interrogation by multiple interrogators. It is a primitive, brutal, and almost primal effort to establish pure dominance over the justice system. And it is exercised upon the personnel of the justice system itself.

---

[27] It is somewhat unusual for a church to regularly use teams of *criminal* rather than civil attorneys in its litigation and on a regular retainer basis. Yet this is Scientology's practice..

[28] I believe that if the Armstrong case is successfully sealed it will do much to impede and confuse both ongoing and future civil litigation, including the I.R.S.'s ongoing litigation with Scientology regarding Scientology's financial fraud. Next to the evidence disclosures of the F.B.I.'s authorized search of Scientology's headquarters, the hard won information disclosed in the Armstrong cases simply is the most important and reliable clarifying hub of information ever revealed about Scientology and Scientology's founder and alter ego, L Ron Hubbard.

An additional part of the design of this "legal brutality" is to punish anyone involved for ever daring to sit in judgment of Scientology. It seems that Scientology is willing to sacrifice even the possibility of rebuilding its completely destroyed reputation, preferring to try to become a notorious legend in hopes of dissuading future litigants and lawyers *from even thinking about* using the justice system against them.

"The Lotticks lost their son, Noah, who jumped from a Manhattan hotel clutching $171, virtually the only money he had not yet turned over to Scientology. His parents blame the Church and would like to sue but are frightened by the organization's reputation for ruthlessness." From the May 6, 1991 Time magazine article.

Now add to Scientology's already formidable anti-adversary reputation, the fact that Scientology hires *criminal* defense attorneys for its *civil* cases and spends an estimated $20 million a year for 100 attorneys.[29]

This estimate for Scientology's total annual legal expenditures still may be grossly underestimated. Consider the expense of covert operations by intelligence operatives, additional hired private investigators, their unprecedented public relations expenses (used to patch up their most embarrassing legal problems [30]), plus the thousands of world-wide staff working full-time or volunteering part time in the legal, intelligence, and public relations areas. Scientology's real legal expenses may run as high as $70 to $100 million a year. *But this can be justified as a reasonable cost of "business as usual" to protect $200-$500 million a year in exceedingly high-profit, often tax free gross income.*

---

[29] In the almost 11 years trying this case, Wollersheim's former attorneys have spent almost $700,000 in out-of-pocket expenses. Wollersheim personally, spent another $400,000, not including attorneys fees. Of the combined total, approximately 50% was for security-related expenses.

[30] When the *LA Times* ran a scathing six part article exposing Scientology's illegal and other antisocial activities, Scientology spent over $1 *million* for billboards all over LA, misquoting the article to make it appear to the uninformed that the *Times* was in some way endorsing Scientology. After the May 6, 1991 cover issue on Scientology by *Time* magazine, Scientology purchased an estimated unprecedented $3 million of full page ads in the major U.S. magazines and newspapers, in another desperate attempt at damage control.

Our detailed documentation of Scientology's adversarial tactics now continues. The following will demonstrate the *methods* by which Scientology puts the justice system and the justice process in turmoil and peril by pioneering its new practice of "legal brutality."

17) Swearing out false lawsuits to intimidate, harass, stop, and discredit a critic or enemy.

18) Repeated use of frivolous and expensive lawsuits to deter individuals and the media from stating anything hostile about Scientology, whether factual or not.

19) "Bludgeoning" opposing witnesses

20) Repeated ignoring of court orders and authority.

21) Attacking judges to stop or slow the case from proceeding.

22) Outrageous conduct which may have the effect of creating their own mistrial.

23) EXTENSIVE SUPPRESSION OF CRITICAL INFORMATION.

24) Filing meritless complaint with legal medical and other professional ethics boards.

25) Possibly seeking to obtain favorable precedents by creating dummy cases where in fact Scientology is the hidden controller and financier of both the plaintiff and defendant positions.

...

17) Swearing out false lawsuits to intimidate, harass, stop, and discredit a critic or enemy. The FBI discovered that Scientology's intelligence operatives tried to discredit Gene Allard, a former high ranking member who had become a government witness on Scientology's financial fraud, by filing a lawsuit that falsely claimed he had stolen $27,000 from Scientology.

Scientology routinely swears out false charges, knowing there is no real penalty in the American legal system for doing so. Recently they went to the Glendale California police and made a groundless kidnapping complaint Pricilla Coates, the Director of an LA cult education group.

18). Repeated use of frivolous and expensive lawsuits to deter individuals and the media from stating anything hostile about Scientology, whether factual or not.[31]) To bury the party suing Scientology in expenses and break their financial ability to pursue justice, Scientology foods the dockets with motions, sues those who sue it in multiple jurisdictions, and sues the plaintiff's lawyers. Scientology has files over 100 lawsuits on the IRS, (one of them a 120 million dollar suit.) Boston personal injury lawyer Michael Flynn, who at one time represented more than two dozen plaintiffs against the church, was sued by the church more than a dozen times in four jurisdictions for everything from contempt to defamation. All the suits were eventually dropped or dismissed.

A recently discovered operation called "Plan 100" calls for 100 lawsuits to be filed on one of its bitter enemies the Cult Awareness Network.

In 1992, the church mounted an all out war against the Cult Awareness Network. According to the CAN Executive Director Cynthia Kisser, there are nine suits pending against CAN by individual Scientologists and church entities in five different jurisdictions, with charges ranging from discrimination----alleging that CAN'S refusal to admit Scientologists to join as members constitutes religious descrimination---to fraud and deceit. [In 1993, the number of these suits has increased into the dozens.] "They are trying to bankrupt CAN," claims one lawyer involved in the litigation. "Its as simple as that."

All of Wollersheim's key lawyers were sued by Scientology in a RICO (Racketeering Influenced and Corrupt Organization Act) suit. After 12 years and hundreds of thousands of dollars in cost, it was dismissed in July 1992. In 1993, just months after losing the RICO suit, Scientology filed a new harassment "try to break them financially suit," Scientology V. Wollersheim. No. C 332 027.

Peter Georgiades who has represented several clients suing Scientology was sued recently for defamation. One suit was dismissed for lack of jurisdiction and another was filed later in another jurisdiction which is still pending. Scientology also filed a $416 million dollar libel suit against *Time* for its recent article on Scientology.

Time's attorney stated, "Our second ground (for dismissal) is that Scientology is libel proof," says Abrams:

> "The church has so often been held to commit evil and despicable acts by courts and so often been written about in an extremely critical manner by others that it has no reputation for libel laws to defend or rehabilitate."[32]

19) "Bludgeoning" opposing witnesses Scientology is notorious for using the courtroom stand to continue to punish former members brave enough to speak out. In the Wollersheim trial. Cooley

---

[31] 5. In a document seized by the F.B.I. in its authorized search of Scientology's headquarters, there is a blunt discussion of how frivolous lawsuits can be used to drive publishers into submission. Jane Kember, at that time the second highest ranking member of Scientology's intelligence section, states that since in the U.S. a person who looses a lawsuit is not required to pay the opponents' costs, frivolous suits are an effective means of imposing unbearable financial burdens *on publishers.*

[32] From The *American Lawyer* article, "The Two Faces of Scientology," by William Horne, July\August 1992.

(their attorney) kept Wollersheim on the stand for two weeks and used confidential auditing confessional material for this purpose.

> "At the [Wollersheim] trial Scientologists packed the courtroom and hallways of the courthouse and regularly interrupted the proceedings by protesting against alleged religious discrimination. "I'd let the jury out, let the [protesters] blab on, and then let the jury back in," says Swearinger. "It didn't bother me." Swearinger says he thought Cooley's histrionics were "comical" rather than effective, and that he often caught the jury, "rolling their eyes" at Cooley's " loud talk and hostility to opposing counsel and witnesses." [33]

20) Repeated ignoring of court orders and authority. For example, "On April 17 of this year {1992} Cooley, church general counsel William Drescher, and Bowles and Moxon named partner Kendrick Moxon, were among a team of church lawyers soundly rebuked in a federal court ruling for their willingness to:

"literally flout court orders and defy the authority of the courts." In his opinion, Los Angeles Federal Special master [judge] James Kolts called the church's tactics a: "cynical and unfair use of the judicial system." [34]

According to a transcript of the hearing, despite having been admonished not to raise issues covered in the briefs---which included the *Time* cover---Cooley jumped right in. "I'd like to address that *Time* magazine article, Your Honor, because I think its crucial," he told judge Letts. The judge disagreed, but that apparently did not deter Cooley. When Cooley continued to bellow over the ringing of the judges gavel, Letts summoned the marshals. According to the opposing lawyer, Cooley scurried out of the courtroom moments before two marshals arrived."[35]

After the court had ordered Wollersheim's files while in Scientology produced for the trial, Scientology destroyed all incriminating sections and altered whatever else it thought it could slide by.

Scientology takes the attitude that it is above the law. The only way to get them to abide by it in substantial issues is to catch them violating it and FORCE them *all the way* to do what is required of them. **This is part of the "legal" brutality philosophy that makes bringing them to justice so difficult and expensive.**

---

[33] From *The American Lawyer* article, "The Two Faces of Scientology," by William Horne, July\August 1992.

[34] From *The American Lawyer* article, "The Two Faces of Scientology," by William Horne, July\August 1992.

[35] From *The American Lawyer* article, "The Two Faces of Scientology," by William Horne, July\August 1992.

21) Attacking judges to stop or slow the case from proceeding. In addition to what has been said earlier:

> "California Superior court judge Ronald Swearinger, who presided over the Wollersheim trial, describes the case itself as anything but normal: Church trial layer Earl Cooley and his co-counsel the late John Peterson filed a number of unsuccessful "writs and motions" throughout the trial in an attempt to halt it, according to Judge Swearinger. Three days into the trial the judge says they moved for his disqualification based on, "some secret conversation I had with someone I never heard of." They also filed a section 1983 federal civil rights action against both him and the judge who sat on the case prior to him, says Swearinger, on the theory that by allowing the case to go to trial, the judges were denying the church its civil rights."[36]

This statement, as carefully documented in the previously-mentioned appendices, shows Scientology attacking judges on anything and everything Scientology can invent. The record shows that this is standard policy and procedure for Scientology in and out of the courtroom. Scientology's history in civil and criminal trials, detailed in the appendices, provides an overwhelming preponderance of evidence to the truth of this statement.

In addition to the numerous examples of Scientology's continuous attack strategy against judges, described in the two previously mentioned articles and in the included appendices, will be found the relentless ongoing pattern of attacking every judge on *bias*. This can be seen happening again in yet another, more recent, example.

> "Just last fall Cooley was brought in to argue the church's motion to recluse Los Angeles Federal Judge James Ideman who was sitting on three cases involving Scientology, based on the judges supposed bias toward the church... The church lost the reclusal motion and eventually appealed the decision up to the U.S. Supreme Court, which declined to grant certiorari."[37]

For more details on Scientology's outrageous history of attacks on judges, see the two newspaper articles "Prior Sect Try at Judge Reported" and "Scientology's War Against Judges" at the end of this appendix.

---

[36] From *The American Lawyer article, "The Two Faces of Scientology," by William Horne, July\August 1992. More information will be presented on Scientology's 40-year history of attacks on judges.*

[37] From The American Lawyer article, "The Two Faces of Scientology," by William Horne, July\August 1992.

22) Do everything possible to create their own mistrial. Scientology creates an atmosphere of fear and bizareness in an attempt to create obvious bias against themselves.

As a deliberate fall-back position, for appeal if they lose, Scientology attempts to create grounds for its own mistrial. They commit outrageous and unsociable acts in the courtroom to create an impression of bias or prejudice. These courtroom antics are socially repugnant, often personally threatening, and may naturally make people feel wary and alienated. *But that is not prejudice.* Scientology's tactics mean that any judge presidiing over a Scientology action will be facing a difficult legal and personal situation.

Affidavits and trial records should be thoroughly reviewed from the former criminal and civil judges, prosecutors, and opposing attorneys who have had the unique first-hand experience of trying to apply justice in a court of law to Scientology. From these records, and review of the Wollersheim trial record, this court will quickly get a clear perspective of Scientology's many mistrial prompting tactics.

23) EXTENSIVE SUPPRESSION OF CRITICAL INFORMATION. Where "freedom of information" is concerned, or the rights of a free press, Scientology is at war with the outside world. We have already discussed intimidation, harrassment, and other methods to silence critics. In addition, Scientology has attempted to use *federal trade secret laws* designed for business applications, to try to prevent anyone from exposing information critical of Scientology. This is done by:

A.) Attempting to establish new interpretations of copyright laws to suppress factual information hostile to Scientology. This was seen in the recent "Hubbard biography" copyright precedent.[39] Scientology's novel interpretation posed a serious threat to the publishing industry's free press right to present important biographical facts on Hubbard that the public has a right to know, or needs for its protection. *After considerable expense this precedent has now been reversed.*

B.) Attempting to, or successfully sealing court cases and records during or after litigation. Often this is done by extorting a "gag order" from a litigant bludgeoned into submission. But in other cases Scientology actually has obtained the court's agreement to seal the records -- for example, in Church of Scientology v. Armstrong No.C. 420153 Cal. Super. CT.(1984). The information contained in the Armstrong case *clearly showed the actual intentions, motivations, and nature of L Ron Hubbard* the founder of Scientology.

Documents in the Armstrong case also evidenced the actual origins and nature of Hubbard's created alter ego, Scientology and Dianetics. They show a massive, critical, and fundamental contradiction between the reality, on the one hand, and, on the other, Scientology's propaganda (which is discussed in another section of

---

[38] See Religious Technology Center v. Robin Scott. (The appeals Court has since ruled there is no such thing as trade secrets for religion.)

[39] New Era Publications, an affiliate of the Church of Scientology, sued publisher Henry Holt & Co. to prevent publication of "Bare Faced Messiah," a biography of L. Ron Hubbard the Scientology founder. The book's author, Russell M. Miller, had quoted 132 pages from unpublished letters and documents, many obtained from government agencies under the Freedom of Information Act.

this Appendix).

The Armstrong documents represent the unifying "hub of the wheel" for all previous taxpayer-paid and other worldwide disclosures concerning Scientology. Of itself, **the Armstrong case is the single most critical piece of the Scientology puzzle that ever has become available, and Scientology --for good reason -- fears its broad dissemination!**

Scientology's continuous efforts to seal the Armstrong public record underscores its importance. Former members have commented that if, when they were evaluating Scientology's actual intentions and statistics using Scientology's own "doubt" formula, if they could have seen all these Hubbard archival documents, no matter how long they had been a loyal Scientology member, *they would have abandoned the organization as a complete sham.*[40]

C.) Attempting to use copyright laws AND unreasonable search and seizure to inhibit its adversaries and suppress archival material on Scientology.[41]

D.) Restricting evidence access. Scientology lawyers have been temporarily successful in restricting freedom of information requests for access to the thousands of documents seized from church headquarters in an authorized search by the FBI. Because of Scientology's use of a special language, Scientologese, and special security encoding much of this seized FBI information may still need translation, coordination, or distribution to the victims for possible legal actions. At the least, these restricted documents are useful and vital to educators and the media for understanding the REAL Scientology.

---

[40] On December 23, 1991 Scientology suffered another in a chain of growing legal defeats. Armstrong was successful it getting the California Appellate court to keep these documents unsealed. Much of the materials herein were presented to that court before its decision.

[41] On October 3, 1990 Scientology allegedly arranged an entrapment operation on an uninvolved, former member (Bostrom) who had a collection of archival materials on Scientology. Two marshals and approximately 15-20 Scientologists showed up with a search warrant. They all then began an unreasonable search and seizure of legitimately acquired Scientology materials from Mr. Bostrom's home. The warrant was issued because several days earlier, Mr. Bostrom allegedly had sold one of his old copyrighted Scientology training packs to a Scientology "sting" operative for approximately $100 dollars.

Access has been restricted to these highly damaging documents, in part, by the requirement that Scientology be informed, in the approval process, of the identity of anyone making such requests. **The potential danger of such prior notice to Scientology is apparent from seized FBI documents.**

E.) Stealing books and materials from public agencies. The Nazi's *burned* books. Scientology uses its operatives to *steal* books and materials critical of it from public libraries. I was directly in touch with one of the operatives involved in thefts from the LA library system. Former_Scientologists Robert Dardano and Warren Friske have testified to the systematic theft and destruction of books critical of Scientology from libraries throughout New England.

Scientology keeps much critical information, such as that revealed in the Armstrong case, among those highest inner few who have passed extensive security and loyalty tests. Because sensitive or critical information is withheld, or given on a strict "need to know" basis, *the vast majority of lower level Scientologists are generally ignorant of the contents of these materials and the real activity of Scientology*. Celebrities such as Tom Cruise, John Travolta, Kirste Alley and others, who have endorsed and are publicly promoting Scientology are, unfortunately, the most isolated and least informed regarding the crucial evaluative information on Scientology presented in these materials.

The record documented herein shows conclusively that, while Scientology hypocritically sells "Communication Courses" and sponsors "freedom of information" attacks on its adversaries,[42] **IT ACTUALLY DOES NOT AND CAN NOT TOLERATE open ommunication or free speech.**

By hiding its crimes and contining abuses, Scientology is trying to avoid just and necessary social awareness and censure. If Scientology is allowed to continue to effectively use these various sealing tactics AND its other adversarial tactics *no one will be informed enough to make rational decisions about Scientology.*[43]

---

[42] Most recently, Scientology has sponsored the "Whistle Blower" program against the I.R.S.

[43] This document is an effort to see that never happens.

24) Filing meritless complaint with legal medical and other professional ethics boards. "Plaintiffs attorney Charles O'Rielly claims he became a target for retaliation after he won a 30 million dollar jury verdict against the church on behalf of former Scientologist Larry Wollersheim... O'Reilly contends that, in the years following the verdict, he was questioned by the California State bar for substance abuse (the inquiry was eventually dropped), by the IRS (the investigation is ongoing), and by the state tax franchise board (no charges were ever brought).

In addition, the church wrote nine letters of complaint to the Massachusetts Board of Bar Overseers about (Michael) Flynn, alleging unethical conduct. Cooley insists that at least one complaint against Flynn was justified. "Flynn had a corporation called FAMCO in which shares were sold to lawyers throughout the country to participate in a nationwide program of civil litigation against the church!" According to a spokesperson for the Massachusetts Board of Bar Overseers, Flynn has never been the subject of a disciplinary action.[44]

Dr. John Clark, an American psychiatrist and outspoken critic of Scientology, also incurred the Church's wrath. According to the Latey decision:

> "Beginning in 1977 the Church of Scientology has conducted a campaign of persecution against Dr. Clark. They wrote letters to the Dean at the Harvard Medical School and to the director of the Massachusetts General Hospital. They refused to gag him. Scientology agents tracked down and telephoned several of his patients and interviewed his neighbors looking for evidence to impugn his private or personal actions. They submitted a critical report to a Committee of the Massachusetts State Senate. On three occasions during the last five years a Scientology "front" called the Citizens' Commission on Human Rights has brought complaints against him to the Massachusetts Board of Registration alleging improper professional conduct. In 1980 he was declared a "Number One Enemy" and in 1981 they brought two law suits against him (summarily dismissed, but costly and worrying). They distributed leaflets at the Massachusetts General Hospital offering a $25,000 reward to employees for evidence which would lead to his conviction on any charge of criminal activity. They stole his employment record from another Boston hospital. They convened press conferences calculated to ruin his professional reputation."

Those voices that have warned of the Scientology danger have had to pay a heavy price. Adjunct Professor of Psychology Margaret Thaler Singer at UC Berkeley, Professors of Psychiatry Louis J. West at UCLA, John G. Clark of Harvard, Martin J. Orne at University of Pennsylvania, Professor of Law Richard DelGado of the UW Madison, and Professors of Sociology, Richard Ofshe at UC Berkeley, and Ronald Enroth of Westmont College, *all have been the targets of both professional and personal attacks*. Distortions of truth and outright lies have included charges that they are CIA operatives, associated with Nazi's, anti religious or the like.

---

[44] From *The American Lawyer* article, "The Two Faces of Scientology," by William Horne, July\August 1992.

Those who continue to speak out become targets of sophisticated intelligence programs to silence them. Expensive lawsuits are filed. Spurious complaints are filed against the victim's lawyers with state Bar associations. Manufactured complaints are frequently registered with medical licensing boards or other regulatory agencies against the professionals who dare testify for the victims. These harassment programs seek to "win" only in the sense that, by silencing those who know, Scientology can continue to exploit new ignorant and naive victims.

When lawsuits do enter the court system, they are usually settled out of court before any unfavorable verdict is reached. Then, as part of the settlement agreement to forestall public attention the case is sealed.

25.) Possibly creating dummy cases where in fact Scientology is the hidden controller and financier of both the plaintiff and defendant positions. There is a suspicion that Scientology has entered into a new level of covert operations on the justice system: the **artificial manufacture of desired precedents by "dummy" cases staged just for that purpose.**

The justice system has not yet come to grips with "undue influence" in the sophisticated and powerful guise used by "thought reform" cults (not just Scientology). Possibly in collusion with other groups with similar interests (those using thought reform techniques[45]) Scientology seeks to create precedents which will say, in effect, "thought reform doesn't exist."

In these suspected dummy cases, the ruse may include sponsoring false scientific studies and using pre-rehearsed members who have the perfect symptoms and answers to produce the legal result that will set a new precedent or mitigate an old precedent. The effect would be to "prove" that thought reform doesn't exist or that their members show none of its effects.

Recently there has been a dis-information campaign to misrepresent the current scientific literature, discredit existing experts, and seal disclosures about thought reform technologies used in groups like Scientology. Within both the American Psychological Association and the American Sociological Association, campaigns have been launched, in effect asking that this technology be declared nonexistent.

---

[45] Four recent cases, all involving a thought reform focus and well organized and financed "religious" organizations, have recently come before the U.S. Supreme Court: Robin George v. International Society of Krishna Consciousness U.S. 89-1399, Holy Spirit Association for Unification of World Christianity [the Moonies] v. David Molko and Tracy Leal U.S. 88-1600, see in particular Brief in opposition to Writ of Certiorari, Church Universal and Triumphant Inc. v. Linda Witt U.S. 89-672, Wollersheim v. Church of Scientology of California U.S. 89-1367. Of the four, the case that has been suspect is Unification of World Christianity [the Moonies] v. David Molko and Tracy Leal U.S. 88-1600. Also see "Coercive Persuasion and Scientology" for more details.

One case that has been highly suspicious in this area is the Holy Spirit Association for Unification of World Christianity [the Moonies][46] v. David Molko and Tracy Leal U.S. 88-1600. When you are involved in a suit with Scientology and its allies, it is necessary to be aware of any other suits that seem to just conveniently "pop up" on issues similar to yours, *especially if they seem perfectly tailored to effect your suit adversely*. While prosecuting the Wollersheim case, on more than one occasion we have had to deal with this phenomena of highly suspicious outside cases, seeming engineered to derail the Wollersheim case and all others that might follow it.

In Summary, Scientology's "Legal Brutality" tactics add a new low to the familiar legal saying, "If you have a good case, you argue the facts. If the facts don't suit you, you argue the law. If you don't have the law on your side, confuse the issues." With "legal" brutality tactics, you don't just confuse the issues. Your target is to actually break down the justice process anywhere and everywhere you can.

When applied as a single tactic (as done by some individuals in the past) the tactic may be considered borderline legal or borderline unethical. When many of these tactics are orchestrated together in a systematic manner, they create a new, previously unheard of threat[47] to the justices process and to its spirit. They put the integrity of the justice process in peril.

---

[46] In U.S. Senate hearings the Moonies were connected to individuals and activities of the Korean CIA.

[47] No one previously has pioneered the intensity and depth or the collective application of the practice of "legal brutality" like Scientology. If they are allowed to be successful you can rely on their state of the art "legal brutality" practices being quickly imitiated by others seeking to exploit what could be a gaping loophole or partial flaw in the justice system.

DETAIL - PART THREE

DOCUMENTATION OF SCIENTOLOGY'S ADVERSARIAL TACTICS

OVERT OPERATIONS

26) Bold faced direct lying,

27) Professional propaganda campaigns.

28) Setting up and using "social reform" groups whose real purpose is to defend Scientology and attack its enemies.

29) Using a front law firm as a de facto extension of Scientology's intelligence division and intimidation intelligence strategy.

30) Deliberately recruiting and using "do anything to get the fee" private investigators.

31) Possibly buying political influence.

...

26.) Bold faced direct lying, Scientology training has raised lying to a precisely practiced art form, as is shown in the following exhibits....

5755

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

INTELLIGENCE SPECIALIST TRAINING ROUTINE - TR L

Purpose: To train the student to give a false statement with good TR-1. To train the student to cutflow false data effectively.

Position: Same as TR-1

Commands: Part 1 "Tell me a lie". Command given by coach. Part 2 interview type 2 WC by coach.

Training Stress: In Part 1 coach gives command, student originates a falsehood. Coach flunks for out TR 1 or TR 0. In Part 2 coach asks questions of the student on his background or a subject. Student gives untrue data of a plausible sort that the student backs up with further explanatory data upon the coach's further questions. The coach flunks for out TR 0 and TR 1, and for student fumbling on question answers. The student should be coached on a gradient until he/she can lie facily.

Short example:

Coach: Where do you come from?
Student: I come from the Housewives Committee on Drug Abuse.
Coach: But you said earlier that you were single.
Student: Well, actually I was married but am divorced. I have 2 kids in the suburbs where I am a housewife, in fact I'm a member of the P.T.A.
Coach: What town is it that you live in?
Student: West Brighton
Coach: But there is no public school in West Brighton.
Student: I know. I send my children to school in Brighton, and that's where I'm a P.T.A. member.
Coach: Oh, and who is the Chairman there?
etc.

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

BOARD TECHNICAL BULLETIN
OF 10 DECEMBER 1969
REISSUED AS BTB 21 JUNE 1975
CANCELS
HCO Bulletin of 10 DECEMBER 1969
SAME TITLE

PRO COURSES
Not for distribution

CONFIDENTIAL

REPORTER TRS

1. Answering non loaded questions

Purpose: To train a PRO to answer such question with confidence and simplicity as are often asked by reporters. E.G.., What is Scientology? What's Clear, OT? How does an E-Meter work?

Method: The PRO and 'reporter' sit across a table facing each other. The 'reporter' asks the questions and the PRO must answer, without a long communication lag and in a way which readily communicates to the reporter. The drill is coached as in the TRs.

The drill is passed when the PRO is confident he can answer the basic questions asked about Scientology.

2. No Answer

Purpose: To train a PRO to give a 'no answer' to questions he has no wish to answer directly.

Method: To begin with the reporter reading the questions asked LRH by 'The Sun' reporter Victor Chapple -- and the PRO reads LRH's answers. This is just to accustom him to the idea of 'no answer'.

Then using different questions, the PRO gives 'no answers'. The trick is to appear to answer the question by giving generalized statements in simple terms so that the reporter doesn't realize that his question hasn't been answered.

The PRO should be completely causative over the communication and end it with certainty, so that the reporter gets this and goes on to the next question.

3. Non sequitur events

Purpose: To enable a PRO to practice getting his "message" across and tag it on to any current event. Also a preparation for the day when our PROs will be asked to comment on current events.

Method: One person has a newspaper in front of him and reads out a headline (and perhaps a line or two of the story if necessary for the PRO's understanding of it). Ask the PRO what comment he would like to make on it. The PRO should comment briefly and lead from this into his message.

This drill is passed when the PRO can tack a message on to virtually any event, smoothly and with reality.

4. Handling a suppressive T.V. Interviewer

Purpose: To train a PRO to get his message across in spite of the 'interviewer', in the few short minutes usually available on television. This is so that .... million people have no doubts after the programme what the Scientologist stands for and what he is against.

Method: The PRO and interviewer face each other and the interviewer asks questions. The PRO attaches his message in varying forms to as many answers as possible. If the interviewer is SP he must be introverted as in the hat write up, and then the PRO has his "say". The interview has been successful when the PRO has got his message across to his satisfaction.

5. Handling an SP

a) By overwhelm

Purpose: To train a PRO to be able to establish Ethics presence over an SP reporter if the occasion arises, by such things as shouting, banging, pointing, swearing. To do this completely causatively until the poor reporter is 'caved in'.

Method: The reporter and PRO sit across a table facing each other and the reporter asks SP questions. The PRO overwhelms without judgment in answer to the SP question until he does it with reality, causativeness and the overwhelm really reaches the reporter. TR 1 is a part of this (ill - there is no point saying the words if they don't reach the other guy.

b) By being knowingly covertly hostile

Purpose: To train the PRO to handle an SP reporter by word alone without the use of force as in (a). He uses the word as a rapier and plunges it at the reporter, so that the reporter introverts and drops the question.

Method: The PRO and reporter sit across a table and the reporter asks SP type questions.

The PRO observes what would be a button in relation to the question asked and throws this back with good TR 1 so that it reaches home. If the reporter is introverted the PRO is successful. If the reporter persists with the same question the PRO should no pr-press the same button - it obviously didn't work. He should drop it and use another one. If the PRO cannot think of a snide reply the reporter should just say "flunk, you haven't handled me. Start - ", or some such remark - but should not tell the PRO what to say. When the confusion has come off the PRO will be able to handle and have a big win.

The drill is completed when the PRO is willing to create a cave in with an accurate snide remark, question or statement.

c) By stalling for time

Purpose: To train a PRO to maintain his confront and composure when given some SP sensational news by a reporter, of which he has no prior knowledge.

Method: The reporter asks the PRO for his comments on an entheta situation involving a Scientologist.

The PRO maintains his ethics presence and duplicates the reporter's nasty angle to his satisfaction. He then stalls for time and gets the reporter to wait a few minutes or hours or so (whatever is necessary) while he checks his facts.

The drill is passed when the PRO is confident that he could not be taken off guard by a reporter by being presented by an unknown situation.

d) By handling the reporter in front of you (verbal Karate)

Purpose: To train a PRO to handle the reporter in front of him, with judgment in present time.

Method: The PRO and the reporter sit across a table facing each other. The PRO is asking a miscellany of questions. If it is a genuine question, he can answer it, if possible tacking his message on to the reply. If the question puts the least bit at effect, he takes this flow and turns it towards the reporter with an even greater velocity. He does this either by a snide remark, question or comment, or by physical overwhelm, whichever seems the right action to establish ethics presence.

He should never allow himself to be put at effect, and should not tolerate it even for an instant, but immediately attack back.

The drill is passed when the PRO no longer uses a machine or method to handle the reporter - but he is totally there, confident and handling.

Comment If your student experiences difficulty on these Trs one of two things are out: a) Scientology TRs 0 - IV are not flat or b) he slipped through a previous Reporter TR without a weakness or button on him being found and flattened.

History These drills have been evolved by PRO WW to train anyone on a gradient scale to handle any situation a reporter could pose. They are based on the HCOP/L 3.2.69 Public Image which states "Don't defend Scn, attack bad conditions and bad hats!"

by Sheila Gaiman
PRAWW
From the hat write up of
David Gaiman
PR Chief WW
Reissued as BTB by
Flag Mission 1234 I/C
CPO Andrea Lewis
for the
BOARDS OF DIRECTORS OF THE
CHURCHES OF SCIENTOLOGY

BDCS:AL:DG:SG:al

Copyright 1969, 1975
by L. Ron Hubbard
ALL RIGHTS RESERVED

Situation TR

Once the normal reporter TR's had been completed Rod & I worked on new drill - Handling the Situation. (This is now done before 5c)

In this we sat opposite each other as before, but the drill was to handle the 'situation'. This was basically a bad scene, in which something unpleasant and catastrophic had happened. Normally it was the sort of thing that one would wish to keep out of the papers.

Examples - all big, dramatic events, reeking of entheta, and all bad news:-

a) You are told a yacht called Apollo, registered in the name of LRH has blown up and sunk 10 miles off Gibraltar.

b) You are told the OES WW & the LRH Comm WW have been stopped at London Airport with L.50,000 in cash & 2 lbs of heroin on them, trying to leave the U.K.

c) You are told that Quentin & Diana H. have been kidnapped by the Mafia in Los Angeles.

d) You are told that the chief witness in the Manson trial, Mrs. L.K. has arrived in London, claiming to be LRH's illegitimate daughter.

e) You are told a doctor in Northern England has been critised by a coroner at an inquest for his use of Dianetics on his patients, one of whom died.

f) You are told that a senior member of the Gdn. Office WW is in the offices of the News of the World at 11 a.m. one Saturday morning, dictating a series of six weekly articles on the 'real lowdown of life in the Gdn. office'.

Now the aim of the drill is to terminatedly handle the situation: in other words keep us out of the Press, keep the journalists quiet, extract us from the situation with honor - kill the story.

We did the drill by giving each other the situation, a couple of minutes to think about it, and then handle.

INTEL TR'S -

TR 3 Int-

Purpose: To teach a Student Int Officer to get the answer to a question without startling a target. To teach him not to be startled by suspicion and Accusation.

Position: Student & Coach facing each other.

Commands: No fixed Commands. Use " Start", " Flunk " & " That's it " as in other TR's.

Training Stress: There are two parts to the drill.

(a) The Coach assumes an identity such as Director of a Drug Firm, or Psychiatrist, or PR Man. Coach also picks a question that the student must get answered such as " What is my address ", "What is my brother's name ", " Have I ever had any connection to FDA". Coach gives the student a couple of minutes to mock up a suitable cover. Then the drill begins with the student being the interviewer who must get the question answered. Flunks are given for being too pushy. Failing to let coach Itsa (a silent int officer Invites Itsa), For making the Coach Suspicious. Coach gets gradiently tougher & evasive.

(b) The coach picks an identity. The student picks a question as above. Flunks are given as in Part (a). If the coach guesses which question the student is trying to get answered (coaches don't go looking for the question but if it sticks out like a sore thumb then Flunk it.) Coach is more evasive in this one & flunks are given for creating suspicion. After the student does this well the coach throws in accusative comments, such " Who are you working for?" " You're a Scientologist" " What are you, a Detective?". Flunks are given for failing to handle & for becoming startled.

This drill is passed when the student can do part (b) of this drill flawlessly.

TR 3 INT WITH BULLBAITING -

Purpose: To teach a student Int Officer to improvise and maintain cover when confronted with something unexpected.

Position: Student and coach facing each other.

Commands: No fixed commands. Use "Start", "Flunk", and "That's it" as in other TRs.

The preceding were the "truth" policies originated by Hubbard directly under the control of Hubbard's wife when she was overall head of all intelligence operations. In spite of Scientology's endless disclaimers about "renegades out of control" and "this was not church policy," Hubbard personally trained his wife and designed the intelligence division of Scientology. At this point, the statement of Judge Breckenridge on L. Ron Hubbard, in his 1984 ruling against the church, seems particularly appropriate:

> "The evidence portrays a man who has been virtually a pathological liar when it comes to his history, background and achievements."

27) PROFESSIONAL PROPAGANDA CAMPAIGNS. Direct lying to its members and agents and to the courts and the government is not the only information distortion technique practiced by the church. Propaganda creation also plays an important role against its adversaries.

L. Ron Hubbard's policies promote hate to Scientology members, to create a polarity and dehumanization which will allow members to commit any illegal, uncivilized, and inhumane act deemed expedient. How Hubbard does this is described in his own policy directives. In HCO PL 5 October 1971 "Propaganda by Redefinition of *Words*":

> "A long term propaganda technique used by socialists (Communists and Nazis alike} is of interest to PR practitioners. I know of no place it is mentioned in PR literature. But the data had verbal circulation in intelligence circles and is in constant current use. The trick is -- WORDS ARE REDEFINED TO MEAN SOMETHING ELSE TO THE ADVANTAGE OF THE PROPAGANDIST. Many instances of planned and campaigned in order to obtain a public opinion advantage for the group doing the propaganda. Given enough repetition of the redefinition public opinion can be altered by altering the meaning of a word. The technique is good or bad depending on the ultimate objective of the propagandist. "Psychiatry" and "psychiatrist" are easily redefined to mean "an antisocial enemy of the people". This takes the kill crazy psychiatrist off the preferred list of professions... The redefinition of words is done be associating different emotions and symbols with the word than were intended... Scientologist are redefining "doctor", "Psychiatry" and "psychology" to mean "undesirable antisocial elements"... The way to redefine a word is to get the new definition repeated as often as possible. Thus it is necessary to redefine medicine, psychiatry and psychology downward and define Dianetics and Scientology upwards. This, so far as words are concerned, is the public opinion battle for belief in your definitions, and not those of the opposition. A consistent, repeated effort is the key to any success with this technique of propaganda. One must know how to do it." -- L. Ron Hubbard.

Here is an example of Hubbard using the same techniques he ascribes to the Communists and Nazis. In Hubbard's own words, from HCOB 24 April 1969:

> "Lately public opinion has turned heavily against the suppressive groups and the public discovery that illegal seizure, torture and murder was hidden activity of political psychiatric groups..."

He takes an emotional generality and associates illegal killing, torture and seizure with psychiatry. *Very good. Hubbard gets an "A" in "Propaganda by Redefinition of Words 101."*

Many of Hubbard other writings do their best to associate the A.M.A. and psychiatry with crime, Nazi concentration camps, the Communists -- almost anything which is despised. Hubbard's policies actively promote fanatical hate in Scientology members toward whatever he views as an enemy.

Understanding this orchestrated promotion of hate, it becomes easier to understand the attitudes and actions of cult members toward Hubbard's enemies. They are fired up by Hubbard's own words., But why would Hubbard use such Black propaganda? In HCO PL 11 May 1971, talking about Black PR, Hubbard states:

> "Exploding it to the public ideally is an effort to make the public a vigilante committee."

GUARDIAN ORDER

GO 82
DGs
AGs
PRO Hat

29th June 1971

For Public Advices

It is time we began to label Psychiatry for what it is, the greatest failure of the Nineteenth Century. Every notorious criminal and defector of the Twentieth Century was in psychiatric hands before the crime. Burgess, MacLean, the Texas Tower murderer, Manson and all the rest were psychiatric failures first. Every infamous modern assassin was a psychiatric failure. Psychiatric victims are endless trouble to our society. We are tracing social turmoil, unrest, widespread drug addiction to psychiatry.

We wish to issue a public warning that psychiatry kills. We in Scientology stand ready to help anyone, and help Governments rid themselves of psychiatric crime. There is urgency in this. In too many cases we are asked to repair persons already maimed beyond human tolerance by psychiatric interference and brutality. We blame psychiatric failure for the state of modern society. We will do all we can to help, but Nineteenth Century Psychiatry must go. We have never had a failure or upset that psychiatry had not first ruined.

L. RON HUBBARD
FOUNDER

LRH/PC

28) Setting up and using "social reform" groups whose real purpose is to defend Scientology and attack their enemies. The FBI discovered in internal secret policy directives it seized from Scientology headquarters that the preceding is the real purpose of these groups.

A partial list of front groups set up and directly or indirectly controlled by Scientology, and which are involved in covertly or overtly attacking adversaries or defending Scientology, includes:

the Committee To Defend The First Amendment
the Hubbard Dianetics Foundation
the Citizens Commission On Human Rights
Narconon
the Committee On Public Health And Safety
the Task Force On Mental Retardation
the Gerus Society
the Dianetic Information Group
the Committee To Re-involve Ex-offenders
the National Commission for Law Enforcement And Social Justice
the Foundation For The Communication of Culture International
Doctors For Religious Liberty
Vanguard, April, (a pseudo anti cult organization)
Alliance To Protect Religious Liberty
Committee For A Safe Environment
American Citizens For Honesty in Government
the Way to Happiness Foundation
the Whistle Blowers
HealthMed
Criminon
Applied Scholastics
Concerned Businessman's Association of America
Sterling Management

Some of these groups also function as front groups for covertly recruiting new members gradually into Scientology.

Scientology's Front Groups play an important role Cult Propaganda. Scientology set up reform groups shortly after Hubbard, in 1966, wrote:

> "Churches are looked upon as reform groups. Therefore we must act like a reform group."

Scientology and Dianetics are held in such disrepute that the press and public seldom believes their propaganda releases. Indoctrinated members can be made to believe the propaganda, but in public Scientology must use front groups to defend it, speak for it, and attack its enemies. Internal confidential documents seized by the F.B.I. show that social reform activities were designed primarily to attack critics publicly from the safe and respectable position of a humane social reform group. An example of Hubbard's thinking on this matter is policy directive HCO PL 12 January 1973 "The Safe Point":

> "...Rule 1...Get in a safe place and speak up. It is necessary of course to have a safe place to get into, from which one can in safely speak up. One cannot defend himself in a point that has no defenses...Thus the Safe Point takes consideration over Active Defense...a special unit must be set up and run at full steam to make a safe point and gain viable PR Area Control over all publics in the area...The PR Area Control action in a new area can go so far as to create in the area of whole past and future track for the activity being established. It can make it sound old-fashioned, stable, reliable, expert, productive..."

The Scientology front social reform groups fulfill Hubbard's directives to a "T." Very few people will attack a social reform group, so Scientology now has its "Safe Point" from which these groups can get its propaganda messages across. The social reform groups do perform social good. If they didn't, they would be useless to Hubbard and easily seen through. In my 11 years in the organization I've noted common denominators to all the good works or public investigations and exposes these front groups perform.

1) The groups become covert recruiting bureaus for Scientology

2) These groups, when exposed, try to lend humanitarian or religious credibility to Scientology. After 11 years inside, my opinion is that Scientology's religious image is a carefully created image and illusion to protect their tax-free profits. The social reform groups that openly acknowledge their connection to Scientology are mainly for this purpose.

3) Exposes by these social reform groups are directed at groups, organizations or individuals that are critical, threatening, or hostile to Hubbard or Scientology.

4) Programs and orders for front group activities come from the intelligence section of Scientology. The top executive posts in the reform groups are guided by paid "church" intelligence staff. They try very hard to conceal these connections.

5.) Any good works done are to make Scientology or Hubbard personally seem "old, established, stable, reliable, expert, and productive."

As "Safe Point" front groups are made known for what they are, new ones will be set up by Scientology to fulfill the vitally needed "Safe Point" function. If the I.R.S. were to dig through the payroll records of these front groups, they might find Scientology again violating *its tax free status by engaging in political activities.*

29) Using a front law firm[48] as a de facto extension of Scientology's intelligence division and intimidation intelligence strategy.

"Bowles and Moxon was formed in 1987 with two lawyers. Moxon, (fee $220 per hour,) and name partner Timothy Bowles, opened an office later that year in the church's Hollywood headquarters complex. Today seven of the firms lawyers are Scientologists including all four partners.

Moxon for example has a long history with the church. In the late 1970's he served a stint as the District of Columbia Assistant Guardian for the Legal Bureau" working in the very office where massive covert operations against the government were being run at the time, according to a stipulation of evidence that was agreed to by all parties in the 1979 federal criminal case against nine of the church leaders. "It's true that I was there doing legal work as a paralegal," says Moxon 42... but he denies criminal operations being run out of the office: "I wasn't aware of it."

For a better understanding of Mr. Moxon's last statement recall the training materials for Guardian Office staff, which he has been trained on, especially the training policy called TRL, Training Routine Lying.

30.) Deliberately recruiting and using "do anything to get the fee" private investigators. Scientology has a policy that states that people and organizations recruit in their own image. This can be seen in Scientology's selection of private investigation firms.

The crown jewel in Scientology's overt intelligence, and the individual who best reflects the recruiting in your own image principle, is Eugene Ingram, a LA private investigator who Scientology is purportedly paying $700,000[49] a year. According to the LA Times, Eugene was a LA police Sergeant until he was dismissed for tipping off drug dealers of upcoming raids and running a house of prostitution. Fellow officers who worked with him describe him as someone who will do anything for money.

Eugene Ingram and the other bottom-of-the-barrel dismissee police detectives and government agency people Scientology now recruits to do its overt dirty work, reflect the true nature of the organization--- an organization that has no intention to reform its ways. If it was sincere about sending the world a signal it really had reformed, it certainly would have Mr. Ingram being paid through their law firms. Would it have its in-house law firm run by a trained Guardian Office member who has signed on for the duration and was operating out of the center where the infiltration of the U.S. government was being coordinated?

Past private investigators who no longer work for Scientology have said they were told to "try to find dirt" In a recent American Lawyer article one investigator said, "[Scientologists are] terribly vindictive and can cause you [any] amount of trouble."

---

[48] Scientology's total annual legal fee estimate is currently $20 million a year, Time Magazine.

[49] In April of 1993 Scientology's $700,000 wunderkind, (Ingram,) came to serve Wollersheim with a new harassment suit. At this time, after a 10-day stake out, he tried to set up a scenario of what would appear to be Wollersheim trying to run him down while the local police were supposed to be watching. Not only did he fail, but he wound up losing his internal operation papers showing that he had illegally accessed Wollersheim's private mail box and was monitoring his mail, as well as other incriminating actions.

The private investigators Scientology recruits reflect their real intentions and the real secret Scientology. Scientology deliberately hires and maintains bottom-of-the-barrel "do anything" private investigators, in conjunction with and through their law firms, so that any information they gather is protected by the attorney-client work product. This ostensible separation shields them from unethical activities by an arm's length of pausable deniability: "This investigator was overzealous and we certainly didn't order them to do that."

These are not the kind of signals that show the world that Scientology has cleaned house or mended its ways. But it does wonderfully highlight the real nature of Scientology and the old business-as-usual story.

One might wonder why Scientology would so obviously further jeopardize rebuilding its no-reputation by using such individuals in key roles of public exposure when at the same time they are spending tens of millions of dollars on PR and Propaganda campaigns to sell the story "we have really changed." There must be some very important reason for taking such a risk

Well, there is. **They are afraid of their own former members speaking out en masse.** These highly visible henchmen serve to scare those who have been on the inside of Scientology and know what those people are like. Those who leave have long since learned to keep their mouths shut. They know who these people are, and that the intelligence and harassment machine is still there!

31) Possibly buying political influence. Has Scientology decided to take some of the hundreds of millions of dollars a year it makes while avoiding taxes that other for-profit organization have to pay, and start using it to buy political influence. You be the judge.

> "Lubell is just one of a stable of reputable lawyers the church has hired over the last decade, who range from Yingling to criminal tax expert Gerald Feffer[50] of D.C's 133 lawyer Williams and Connolly (Yingling's husband) to the church's general counsel William Drescher, (paid $540,000 a year by Scientology,) a former partner of LA's now defunct Wyman,, Bautzer, Kuchel and Silbert.
>
> "*The Internal Revenue Service* has been trying to bring Scientology to justice, so far, to little avail. Scientology claims the IRS has a bias against it and is out to get the church even though its taxes are aboveboard. I'm sure the IRS does have a bias against Scientology just as it had a legitimate bias against Al Capone....

---

[50] Feffer was a former deputy assistant attorney general in the tax department of the Justice Department. Feffer, as a new member of Scientology' s legal team (fee $350 per hour), in November 1986 somehow quickly disposed of a nascent criminal tax investigation into Scientology at the Justice Department Tax division. The question remains, "Did Scientology buy influence and "old buddy you owe me one" network credibility to avoid justice? Is this the type of situation Clinton called the revolving door of government jobs to private sector jobs? Review of this whole transaction should be considered at the Justice Department by the seniors of the individuals who cut the deal with Feffer.

An October 1990 news release from the church [of Scientology], said Senator John McCain and Reps. Jon Kyl, John Rhodes, Bob Stump and then Rep. Morris Udall had written to the IRS asking it to explain why it was targeting Scientologists. I find it hard to believe these guys didn't have a clue. Then again God hasn't blessed us with the brightest politicians."

-- from the *Arizona Republic* June 29, 1991.

PUTTING SOME OF IT TOGETHER

THE "NEW" SCIENTOLOGY'S NEVER-ENDING STORY OF ACTIONS AGAINST ITS ADVERSARIES

THE ARMSTRONG EXAMPLE

According to the theoretical "bible" of intelligence strategy used by Scientology, a book called the "Art Of War," it is always better to undermine your enemies plans than to attack their armies. The Armstrong case is a good example of the coordinated strategy of the "new" Scientology and the "new" Scientology Executives in action. **It demonstrates the true Scientology style in handling truth, cover stories, intelligence tactics, and their conspiratorial world view in action against important current adversaries.**

From Scientology's legal arguments which attempted to seal the Armstrong case from the public and media:

> "The infiltration of the church was planned as an undercover operation by the LA CID, [criminal investigation division of IRS,] along with former church member Gerald Armstrong, who planned to seed church files with forged documents which the IRS could then seize in a raid. The IRS planned to assist Armstrong in taking over the Church of Scientology hierarchy which then turn over all church documents to the IRS for their investigation."

> "Armstrong has admitted, in a videotaped interview, to creating forged documents for placement in church files for the sole purpose of giving the false appearance of unethical or illegal actions committed by the church; and Armstrong has admitted, in a videotaped interview, his intention to commit perjury..."

> "In November 1984 [] Armstrong was plotting against the Scientology Churches and seeking out staff members in the Church who would be willing to assist him in overthrowing Church leadership. The Church obtained information about Armstrong's plans and, through a police sanctioned investigation, provided Armstrong with the "defectors he sought."

To what lengths will Scientology go to create false and misdirecting cover stories? In this case, Scientology was expecting a major new IRS investigation and another adverse ruling. The above-quoted paragraphs were provided a damage control cover story and a poison pill deterrent for the expected IRS problem. Using it, Scientology hoped to make itself look like a poor, weak, and harmless persecuted religion being taken over by a big, feared, anti-religious government agency in conspiracy with a Scientology defector.

This rather transparent strategy was designed to draw the uninformed to its defense and scare the IRS into backing off. This black PR tactic, and the "hopelessly intertwined" religious issue confusions attached to it, are relied upon to create a "smoke and mirror" conspiracy in the minds of judges, legitimate religions, and honest civil libertarian groups. (Full details on Scientology's paradoxical use of the "hopelessly intertwined" religious issues are contained in the "Pervasive Pretext and Scientology" chapter.)

You saw, on the previous page, Scientology's version of the Armstrong story. You have read the Scientology policy called TR-L (Training Routine, Lying). Keep that policy in mind as you read the real story of Gerry Armstrong, as it was decided in the court under the rules of evidence. (The Armstrong story appeared in the "inFormer," a leading newsletter of former Scientologists.)

THE TRIALS OF GERRY ARMSTRONG

The following is an except from the Breckenridge decision in 1984 where he describes the history of the case. It is now judicial fact. From the Informer Newsletter. (All during the Armstrong events, which go on to this day, the same two individuals ran the "new" Scientology: David Misgauge and Norman Starkey.)

Defendant Armstrong was involved with Scientology from 1969 through 1981, a period spanning 12 years. During that time he was a dedicated and devoted member who revered the founder, L. Ron Hubbard. There was little that Defendant Armstrong would not do for Hubbard or education, one-third of his life, money and anything he could give in order to further the goals of Scientology, goals he believed were based upon the truth, honesty, integrity of Hubbard and the Organization.

From 1971 through 1981, Defendant Armstrong was a member of the Sea Organization, a group of highly trained Scientologists who were considered the upper echelon of the Scientology organization.

During those years he was placed in various locations, but it was never made clear to him exactly which Scientology corporation he was working for. Defendant Armstrong understood that, ultimately, he was working for L. Ron Hubbard, who controlled an Scientology finances, personnel, and operations while Defendant was in the Sea Organization.

Beginning in 1979 Defendant Armstrong resided at Gilman Hot Springs, California, in Hubbard's "Household Unit." The Household Unit took care of the personal wishes and needs of Hubbard at many levels. Defendant Armstrong acted as the L. Ron Hubbard Renovations In-Charge and was responsible for renovations, decoration, and maintenance of Hubbard's home and office at Gilman Hot Springs.

In January of 1980 there was an announcement of a possible raid to be made by the FBI or other law enforcement agencies of the property. Everyone on the property was required by Hubbard's representatives, the Commodore's Messengers, to go through all documents located on the property and "vet" or destroy anything which showed that Hubbard controlled Scientology organizations, retained financial control, or was issuing orders to people at Gilman Hot Springs.

A commercial paper shredder was rented and operated day and night for two weeks to destroy hundreds of thousands of pages of documents.

During the period of shredding, Brenda Black, the individual responsible for storage of Hubbard's personal belongings at Gilman Hot Springs, came to Defendant Armstrong with a box of documents and asked whether they were to be shredded. Defendant Armstrong reviewed the documents and found they consisted of a wide variety of documents including Hubbard's personal papers, diaries, and other writings from a time before he started Dianetics in 1950, together with documents belonging to third persons which had apparently been stolen by Hubbard or his agents. Defendant Armstrong took the documents from Ms. Black and placed them in a safe location on the property. He then searched for and located another twenty or more boxes containing similar materials, which were poorly maintained.

On January 8, 1980, Defendant Armstrong wrote a petition to Hubbard requesting his permission to perform the research for a biography to be done about his life. The petition states that Defendant Armstrong had located the subject materials and lists of a number of activities he wished to perform in connection with the biography research.

Hubbard approved the petition, and Defendant Armstrong became the L. Ron Hubbard Personal Relations Officer Researcher (PRO Res). Defendant claims that this petition and its approval forms the basis for a contract between Defendant and Hubbard. Defendant Armstrong's supervisor was then Laurel Sullivan, L. Ron Hubbard's Personal Public Relations Officer.

During the first part of 1980, Defendant Armstrong moved all of the L. Ron Hubbard Archives materials he had located at Gilman Hot Springs to an office in the church of Scientology Cedars Complex in Los Angeles. These materials comprised approximately six file cabinets. Defendant Armstrong had located himself in the Cedars Complex, because he was also involved in "Mission Corporate Category Sort-Out," a mission to work out legal strategy. Defendant Armstrong was involved with this mission until June of 1980.

It was also during this early part of 1980 that Hubbard left the location in Gilman Hot Springs, California, and went into hiding. Although Defendant Armstrong was advised by Laurel Sullivan that no one could communicate with Hubbard, Defendant Armstrong knew that the ability for communication existed, because he had forwarded materials to Hubbard at his request in mid 1980.

Because of this purported inability to communicate with Hubbard, Defendant Armstrong's request to purchase biographical materials of Hubbard from people who offered them for sale went to the Commodore's Messengers Organization, the personal representatives of Hubbard.

In June of 1980 Defendant Armstrong became involved in the selection of a writer for the Hubbard biography. Defendant Armstrong learned that Hubbard had approved of a biography proposal prepared by Omar Garrison, a writer who was not a member of Scientology. Defendant Armstrong had meetings with Mr. Garrison regarding the writing of the biography and what documentation and assistance would be made available to him. As understood by Mr. Garrison, Defendant Armstrong represented Hubbard in these discussions.

Mr. Garrison was advised that the research material he would have at his disposal were Hubbard's personal archives. Mr. Garrison would only undertake a writing of the biography if the materials provided to him were from Hubbard's personal archives, and only if his manuscript was subject to the approval of Hubbard himself.

In October of 1980 Mr. Garrison came to Los Angeles and was toured through the Hubbard archives material that Defendant Armstrong had assembled up to that time. This was an important "selling point" in obtaining Mr. Garrison's agreement to write the biography. On October 30, 1980, an agreement was entered into between Ralston-Pilot, ncv. F/S/O Omar V. Garrison, and AOSH DK Publications of Copenhagen, Denmark, for the writing of a biography of Hubbard.

Paragraph 10B of the agreement states that:

"Publisher shall use its best efforts to provide Author with an office, an officer assistant and/or research assistant, office supplies and any needed archival and interview materials in connection with the writing of the Work." The "research assistant" provided to Mr. Garrison was Defendant Armstrong.

During 1980 Defendant Armstrong exchanged correspondence with Intervenor regarding the biography project. Following his approval by Hubbard as biography researcher, Defendant Armstrong wrote to Intervenor on February 5, 1980, advising her of the scope of the project. In the letter Defendant stated that he had found documents which included Hubbard's diary from his Orient trip, poems, essays from his youth, and several personal letters, as well as other things.

By letter of February 11, 1980, Intervenor responded to Defendant, acknowledging that he would be carrying out the duties of Biography Researcher. On October 14, 1980, Defendant Armstrong again wrote to Intervenor, updating her on "Archives materials" and proposing certain guidelines for the handling of those materials.

It was Intervenor who, in early 1981, ordered certain biographical materials from "Controller Archives" to be delivered to Defendant Armstrong. These materials consisted of several letters written by Hubbard in the 1920's and 1930's, Hubbard's Boy Scout books and materials, several old Hubbard family photographs, a diary kept by Hubbard in his youth, and several other items.

Defendant Armstrong received these materials upon the order of Intervenor following his letter of October 15, 1980, to her in which defendant stated, at page 7, that there were materials in the "Controller Archives" that would be helpful to him in the biography research.

After these materials were delivered to Defendant Armstrong, Intervenor was removed from her Scientology position of Controller in 1981, presumably because of her conviction for the felony of obstruction of justice in connection with the theft of Scientology documents from various government offices and agencies in Washington, D.C.

During the time Defendant Armstrong worked on the biography project and acted as Hubbard Archivist, there was never any mention that he was not to be dealing with Hubbard's personal documents or that the delivery of those documents to Mr. Garrison was not authorized.

For the first year or more of the Hubbard biography and archive project, funding came from Hubbard's personal staff unit at Gilman Hot Springs, California. In early 1981, however, Defendant Armstrong's supervisor, Laurel Sullivan, ordered him to request that funding come from what was known as SEA Org Reserves. Approval for this change in funding came from the SEA Org Reserves Chief and Watch Dog Committee, the top Commodores Messenger Organization unit, who were Hubbard's personal representatives.

From November of 1980 through 1981, Defendant Armstrong worked closely with Mr. Garrison, assembling Hubbard's archives into logical categories, copying them and arranging the copies of the Archives materials into bound volumes. Defendant Armstrong made two copies of almost all documents copied for Mr. Garrison one for Mr. Garrison and the other to remain in Hubbard Archives for reference or recopying. Defendant Armstrong created approximately 400 binders of documents. The vast majority of the documents for Mr. Garrison came from Hubbard's personal Archives, of which Defendant Armstrong was in charge. Materials which came from other Archives, such as the Controller Archives, were provided to Defendant Armstrong by Scientology staff members who had these documents in their care.

It was not until late 1981 that Plaintiff was to provide a person to assist on the biography project by providing Mr. Garrison with "Guardian Office" materials. otherwise described as technical materials relating to the operation of Scientology. The individual appointed for this task was Vaughn Young. Controller Archives and Guardian Office Archives had no connection to the Hubbard Archives, which Defendant Armstrong created and maintained as Hubbard's personal materials.

In addition to the assemblage of Hubbard's Archives, Defendant Armstrong worked continually on researching and assembling materials concerning Hubbard by interviewing dozens of individuals, including Hubbard's living aunt, uncle, and four cousins. Defendant Armstrong did a genealogy study of Hubbard's family and collected, assembled, and read hundreds of thousands of pages of documentation in Hubbard's archives.

During 1980 Defendant Armstrong remained convinced of Hubbard's honesty and integrity and believed that the representations he had made about himself in various publications were truthful. Defendant Armstrong was devoted to Hubbard and was convinced that any information which he discovered to be unflattering of Hubbard or contradictory to what Hubbard has said about himself, was a lie being spread by Hubbard's enemies. Even when Defendant Armstrong located documents in Hubbard's Archives which indicated that representations made by Hubbard and the Organization were untrue, Defendant Armstrong would find some means to "explain away" the contradictory information.

Slowly, however, throughout 1981, Defendant Armstrong began to see that Hubbard and the Organization had continuously lied about Hubbard's past, his credentials, and his accomplishments. Defendant Armstrong believed, in good faith, that the only means by which Scientology could succeed in what Defendant Armstrong believed was its goal of creating an ethical environment on earth, and the only way Hubbard could be free of his critics, would be for Hubbard and the Organization to discontinue the lies about Hubbard's past, his credentials, and accomplishments. Defendant Armstrong resisted any public relations piece or announcement about Hubbard which the L. Ron Hubbard Public Relations Bureau proposed for publication which was not factual. Defendant Armstrong attempted to change and make accurate the various "about the author" sections in Scientology books, and further, Defendant rewrote or critiqued several of these and other publications for the L. Ron Hubbard Public Relations Bureau and various Scientology Organizations. Defendant Armstrong believed and desired that the Scientology Organization and its leader discontinue the perpetration of the massive fraud upon the innocent followers of Scientology, and the public at large.

Because of Defendant Armstrong's actions, in late November of 1981, Defendant was requested to come to Gilman Hot Springs by Commodore Messenger Organization Executive, Cirrus Slevin. Defendant Armstrong was ordered to undergo a "security check," which involved Defendant Armstrong's interrogation while connected to a crude Scientology lie detector machine called an E-meter.

The organization wished to determine what materials Defendant Armstrong had provided to Omar Garrison. Defendant Armstrong was struck by the realization that the Organization would not work with him to correct the numerous fraudulent representations made to followers of Scientology and the public about L. Ron Hubbard and the Organization itself. Defendant Armstrong, who, for twelve years of his life, had placed his complete and full trust in Mr. and Mrs. Hubbard and the Scientology Organization, saw that his trust had no meaning and that the massive frauds perpetrated about Hubbard's past, credentials, and accomplishments would continue to be spread.

Less than three weeks before Defendant Armstrong left Scientology, he wrote a letter to Cirrus Slevin on November 25, 1981, in which it is char that his intentions in airing the inaccuracies, falsehoods, and frauds regarding Hubbard were done in good faith. In his letter he stated as follows:

"If we present inaccuracies, hyperbole or downright lies as fact or truth, it doesn't matter what slant we give them, if disproved the man will look, to outsiders at least, like a charlatan. This is what I'm trying to prevent and what I've been working on the past year and a half. .

"and that is why I said to Norman that it is up to us to insure that everything which goes out about LRH is one hundred percent accurate. That is not to say that opinions can't be voiced, they can. And they can contain all the hype you want. But they should not be construed as facts. And anything stated as a fact should be documentable.

"We are in a period when "investigative reporting" is popular, and when there is relatively easy access to documentation on a person. We can't delude ourselves I believe, if we want to gain public acceptance and cause some betterment in society, that we can get away with statements, the validity of which I don't know.

"The real disservice to LRH, and the ultimate make wrong is to go on assuming that everything he's ever written or said is one hundred percent accurate and publish it as such without verifying it. I'm talking here about biographical writings. This only leads, should any of his statements turn out to be inaccurate, to a make-wrong of him, and consequently his technology.

"That's what I'm trying to remedy and prevent.

"To say that LRH is not capable of hype, errors or lies is certainly (sic) not granting him much of a beingness. To continue on with the line that he has never erred nor lied is counterproductive. It is an unreal attitude and too far removed from both the reality and people in general that it would widen public .

"...That is why I feel the falsities must be corrected, and why we must verify our facts and present them in a favorable light."

The remainder of the letter contains examples of facts about Hubbard which Defendant Armstrong found to be wholly untrue or inaccurate and which were represented as true by the Hubbard's and the Scientology Organization.

In December of 1981 Defendant Armstrong made the decision to leave the Church of Scientology. In order to continue in his commitment to Hubbard and Mr. Garrison in the biography project, he copied a large quantity of documents, which Mr. Garrison had requested or which would be useful to him for the biography. Defendant Armstrong delivered all of this material to Mr. Garrison the date he left the SEA Organization and kept nothing in his possession.

Thereafter, Defendant Armstrong maintained friendly relations with Hubbard's representatives by returning to the Archives office and discussing the various categories of materials. In fact on February 24, 1982, Defendant Armstrong wrote to Vaughn Young, regarding certain materials Mr. Young was unable to locate for Omar Garrison.

After this letter was written, Defendant Armstrong went to the Archives office and located certain materials Mr. Garrison had wanted which Hubbard representatives claimed they could not locate.

At the time Defendant Armstrong left the SEA Organization, he was disappointed with Scientology and Hubbard, and also felt deceived by them. However, Defendant Armstrong felt he had no enemies and felt no ill will toward anyone in the Organization or Hubbard, but still believed that a truthful biography should be written.

After leaving the SEA Organization, Defendant Armstrong continued to assist Mr. Garrison with the Hubbard biography project. In the spring of 1982, Defendant Armstrong at Mr. Garrison's request, transcribed some of his interview tapes, copied some of the documentation he had, and assembled several more binders of copied materials. Defendant Armstrong also set up shelves for Mr. Garrison for all the biography research materials, worked on a cross-reference systems, and continued to do library research for the biography.

On February 18, 1982, the Church of Scientology International issued a "Suppressive Person Declare Gerry Armstrong," which is an official Scientology document issued against individuals who are considered as enemies of the Organization. Said Suppressive Person Declare charged that Defendant Armstrong had taken an unauthorized leave and that he was spreading destructive rumors about Senior Scientologists.

Defendant Armstrong was unaware of said Suppressive Person Declare until April of 1982. At that time a revised Declare was issued on April 22, 1982. Said Declare charged Defendant Armstrong with 18 different "Crimes and High Crimes and Suppressive Acts Against the Church." The charges included theft, juggling accounts, obtaining loans on money under false pretenses, promulgating false information about the Church, its founder, and members, and other untruthful allegations designed to make Defendant Armstrong an appropriate subject of the Scientology "Fair Game Doctrine." Said Doctrine allows any suppressive person to be "tricked, cheated, lied to, sued, or destroyed."

The second declare was issued shortly after Defendant Armstrong attempted to sell photographs of his wedding on board Hubbard's ship (in which Hubbard appears), and photographs belonging to some of his friends, which also included photos of L. R. Hubbard while in seclusion. Although Defendant Armstrong delivered the photographs to a Virgil Wilhite for sale, he never received payment or return of his friend's photographs. When he became aware that the Church had these photographs, he went to the Organization to request their return. A loud and boisterous argument ensued, and eventually was told to leave the premises and get an attorney.

From his extensive knowledge of the covert and intelligence operations carried out by the Church of Scientology of California against its enemies (suppressive persons), Defendant Armstrong became terrified and feared that his life and the life of his wife were in danger, and he also feared he would be the target of costly and harassing lawsuits. In addition, Mr. Garrison became afraid for the security of the documents and believed that the intelligence network of the Church of Scientology would break and enter his home to retrieve them. Thus, Defendant Armstrong made copies of certain documents for Mr. Garrison and maintained them in a separate location.

It was thereafter, in the summer of 1982, that Defendant Armstrong asked Mr. Garrison for copies of documents to use in his defense and sent the documents to his attorneys, Michael Flynn and Contos & Bunch.

After the within suit was filed on August 2, 1982, Defendant Armstrong was the subject of harassment, including being followed and surveilled by individuals who admitted employment by Plaintiff; being assaulted by one of these individuals; being struck bodily by a car driven by one of these individuals; having two attempts made by said individuals apparently to involve Defendant Armstrong in a freeway automobile accident; having said individuals come onto Defendant Armstrong's property, spy in his windows, create disturbances, and upset his neighbors. During trial when it appeared that Howard Schomer (a former Scientologist) might be called as a defense witness, the Church engaged in a somewhat sophisticated effort to suppress his testimony. It is not clear how the Church became aware of defense intentions to call Mr. Schomer as a witness, but it is abundantly clear they sought to entice him back into the fold and prevent his testimony.

THE WOLLERSHEIM CASE

TIMES CHANGE, TACTICS DON'T

What are the real reasons behind Scientology's endless stream of character assassinations?

> "The defense of anything is untenable. The only way to defend anything is to attack, and if you ever forget that, you will lose every battle you are engaged in, weather it is in terms of personal conversation, public debate, or a court of law. NEVER BE INTERESTED IN CHARGES. Do yourself, much MORE CHARGING, and you will win."

Another key reason for Scientology's adversarial tactics is not so much for the outside public, but *to redirect their own members attention away from critically thinking* about or investigating any of the adverse charges leveled against Scientology. As illogical as it sounds, when members see Scientology attacking accusers, they have been conditioned to think "We are attacking them louder and longer, therefore we must be right." Although this tactic is more suitable to the Nazi Germany era, "if a lie is told loud enough and long enough it will be believed," it is a continually repeated Scientology technique to minimize the effect of doubts creeping into its income base.

A secondary effect of character assassination is to isolate current members from communication or cooperation with the "evil or crazy" former members who have been exposed to non-censored information. These two factors, plus the desire to limit the applicability of future legal precedents, are at play in the Wollersheim case.

Wollersheim has been repeatedly characterized by Scientology in the media and to its members, as a draft evading college dropout, con man, drug-using hippie drifter, a wife beater with severe emotional problems and having a prior mental history. Scientology also claimed that Wollersheim tried to extort money from the church, broke into church files illegally, ran out on debtors, falsified accounts receivables to obtain loans, was institutionalized for mental problems before being a Scientology member, and lashed out against Scientology when his dreams of wealth failed to materialize. Apparently the Court saw the financial persecution differently:

> "Substantial evidence supports the conclusion Scientology leaders made the deliberate decision to ruin Wollersheim economically and possibly psychologically... Nothing... (in any) case we have been able to locate even implies a religion is entitled to constitutional protection for a campaign deliberately designed to financially ruin anybody--whether a member or nonmember of that religion."

To help create the necessary internal explanatory illusion and to help set the stage for limiting the precedent if they lost, besides issuing a general public notice of expulsion, Scientology created and distributed a 10 page "dead agenting"[51] document called the "Wally Affidavit." In this document, in the form of a satirical and often illogical story, are statements designed to clearly signal members that Wollersheim was evil, a total "nut case," and what Scientology technology calls in its loaded language a "Type III" (completely psychotic).

Without explanation, the document alludes to Wollersheim communicating with aliens from outer space and being ordered by them to attack Scientology. It went on to imply that while still a member, Wollersheim tried to sell an embarrassing news story on Scientology, TO Scientology, for 10 million dollars.

The implication was also made that all important Scientology-approved, certified, or validated achievements that Wollersheim had ever completed or attained were attained under fraud, and that Wollersheim had secretly been using his falsely attained status for personal gain. This served as a cover story to members to help explain the failure of Scientology's infallible technology and its elite personnel's gross failure to discover these "facts" during Wollersheim's 10 years in Scientology and approximately $100,000 in paid and received Scientology services.

Even with ex-members who have been out for years, Wollersheim still finds individuals reluctant at first to cooperate with him because all they know is the "nut case" intelligence line they were fed in Scientology.

> "Entirely by bringing about public conviction that the sanity of a person is in question it is possible to discount and eradicate all the goals and activities of that person."
> From the "Brainwashing Manual" ascribed• to L Ron Hubbard.

Oddly enough, current members or others repeating the Scientology attack line (that Wollersheim had a mental history) do not wonder about the glaring incongruity that Wollersheim was a mid-level executive Sea Org staff member who had gone through most of the secret OT levels. Sea Org membership, and access to the OT levels **both require, according to strict Scientology policy, that the person have no history of mental illness or institutionalization.** Wollersheim was carefully screened and completely security checked by Scientology before he was allowed on Sea Org staff or allowed on the upper levels. *No valid prior mental or institutional history existed until Scientology's intelligence division decided to promote one out of an incident it helped to create.*[53]

---

[51] An intelligence tactic for destroying the credibility and jeopardizing an individual or operative.

[52] See "Coercive Persuasion and Scientology" appendix for details of Hubbard's covert authorship of this manual.

[53] Scientology staff members, on advice from their intelligence branch in Minneapolis, advised Wollersheim how to stage a false psychiatric and institutional history with the Milwaukee draft board to assist Wollersheim in avoiding the draft and becoming a future staff member FOR Scientology.

The character assassination does not stop here. To falsely limit the Wollersheim liability precedent to "only individuals who had PRIOR mental histories BEFORE getting into Scientology," Scientology's intelligence division rewrote and created several false "histories" for Wollersheim. Scientology also promotes that Wollersheim was an incipient manic[54] depressive prior to Scientology and that Wollersheim is still an unbalanced manic depressive.[55]

The facts demonstrate otherwise, Wollersheim had no dormant or prior history of manic depression. After being exposed to Scientology Wollersheim did have temporary episodes of manic depression which Scientology itself caused when they broke Wollersheim down in their experimental thought reform processes.[56]

As an adversary of Scientology, one of the first things one must give up is a sensitivity about reputation. Over the past years Wollersheim has been reluctant to defend himself and has not answered his accusers' cover stories. Now, after 12 years, Wollersheim is more openly associated with the work of bringing justice to Scientology and helping its victims. The slurs against him personally could damage the credibility of those activities. So it is time to say that **Scientology's statements are gross TR-L (Training Routine Lying) -style distortions or outright lies.**

There is a "coincidence" that occurred during Wollersheim's 6-month trial which helps make this point perfectly clear. It also has the attempted precedent-limiting intelligence signature of creating and rewriting "history" all over it.

One lunch break in the emptied courtroom, while the evidence exhibits were apparently not being guarded, someone altered Dr. Margaret Singer's notes on her interviews with me to read that I had taken 300 LSD trips before entering Scientology. (Dr. Singer was the expert psychologist testifying on my behalf.) The document was remembered to not have this on it when it was entered into evidence. When Dr. Singer verified by phone that no such event occurred and she never wrote such a statement in her notes this signature incident created a flurry in the courtroom.

Whether it's Armstrong, Wollersheim, Fishman, O'Rielly, Alexander, the Aznerands, Rokos, Kisser, Cezares, Wakefield, Schomer, Flynn, Yanni, Coredon, L Ron Hubbard Jr., Orsini, Behar, Cooper, Kaufman, Singer, West, Clark, Levitt, Mclean, Sulivan, Walters, Mayo, Flynn, McMurray, the Broekers, other judges, government investigators or prosecutors, ex-members, ex-celebrity members, new defectors, media people, adversarial witness or experts, **expect to see these policies enacted. All that will change is the names and details of their attention-redirecting cover stories and their rewrites of history and reality.**--- And,

These are not renegade acts. Scientology has become as determined and skillful in character assassinations as the middle eastern hashish assassins of the middle ages were in actual assassinations. Scientology's actions are completely consistent and congruent with the spirit and letter of their policies. In fact, their policy and world view DEMANDS such actions.

---

[54] The courts have been caught occasionally by Scientology's sophisticated intelligence skills in creating "reality" by rewriting "histories" with false and altered documents. Our court systems are simply not equipped to spot and sort out a governmental level of professional intelligence work.

[55] A high level defector recently disclosed a forged letter-writing operation. Fake letters allegedly from my relatives were to be sent to my attorney implying that I was a zealot and would never settle with Scientology, thus my attorney would be smart to quit the case.

[56] See the "Coercive Persuasion and Scientology" chapter for full details on this and what other types of damage occur when you subject someone unknowingly to a thought reform program.

MORE SCIENTOLOGY INTELLIGENCE OPERATIVE TRAINING MATERIALS

The following operative training materials will demonstrate more of the machievalian depth of detailed PROFESSIONAL sophistication, deception and cover of Scientology's intelligence operations. Training programs and materials as are found in this appendix are not credibly assigned to a small renegade group operating on its own initiative without the knowledge or direct senior level control of Scientology. The signatures on these directives were the top executives in Scientology.

Scientology and its representatives somehow believe that simply because they tell us they have changed, we will now believe that an intelligence agency, because it has changed its name from the Guardians office to the Office of Special Affairs (OSA), has now become a church. Somehow Scientology thinks we are all going to ignore the 40-year history of facts which demonstrate that:

1.) All Scientology actions are directed by Scientology secret or public policy.

2.) All Scientology policy of importance comes only from the very top of the organization.

3.) Scientology is a robotic organization that only and always follows its own secret or public policies

4.). There are no renegade actions in Scientology. Hubbard developed the Guardians office, developed its policy, trained its top people (Mary Sue Hubbard his wife) and had them report directly to him on a daily basis in disguised ways.

5.) The Guardians office and the Watchdog Committee created the OSA to support a cosmetic cover story about change and cleaning house. The OSA continues with the same old actions, uses the same old secret policy developed by Hubbard (maybe now scrambled and security protected in their new computer system), and uses many of the same Guardians office staff, (i.e., Heber Jentchz the new president of the reformed "church," and Kendrick Moxon head of their in-house legal firm). The top levels were personally trained by Hubbard (Misgauge, Starkey and the old Watchdog Committee). The only thing that's different is that they are reporting to Misgauge and Starkey not Hubbard.

The big lie that Scientology hopes someone will believe, is that all its past outrageous activities were done by a tiny group of unsophisticated, disconnected, low level renegades who are now gone. Saying that all the individuals who were involved in the criminal activities are gone is another big lie. Even most of those who were publicly disavowed are secretly still involved.

If someone who has studied this information and has the misfortune to be on Scientology's enemy list believes that last statement, then I imagine that person also believes in mother goose. Scientology hasn't changed because Scientology's nature and policy hasn't changed. And, the way you know for certain Scientology's nature and policy hasn't changed is because Scientology's actions haven't changed.

How can you change the "fruit" unless you change the "root." Until Scientology publicly disavows Hubbard, the actual "root" source of the insane secret "church" policies, Scientology can't even begin to change its nature. It will just become more secretive. Until it publicly disavows Hubbard's sociopathic policies it will blindly keep following them *because that's what Scientology policy says to do*, for example, the "Keeping Scientology Working" policy.

Scientology changing its real nature because it tells you it has done so, reminds me of the story of the Scorpion and the frog. A scorpion wanted to cross a river so it went up to the frog and said. " Take me across the river on your back." But the frog said, "No way, you will sting me to death and I'll die. The Scorpion replied, "I wouldn't do that then I would drown and die too." The frog thought about this but still didn't believe the scorpion.

After much reluctance and continual convincing by the scorpion that he had changed and wouldn't sting him, the frog finally consented to carry the scorpion across the river on its back. Half way across the river the scorpion the scorpion stung the frog. As the frog began sinking and dying he said, Why did you sting me after you promised you had changed and wouldn't? Now were both going to die." And the scorpion replied, "I couldn't help myself. It's my nature."

(If you would like to read more detailed intelligence training procedures, continue on through the next section. If you have seen enough, go directly to the conclusion and news articles.)

About the following additional materials

In these materials a covert agent such as Dardano, who was mentioned earlier, is officially known in Scientology parlance as an F.S.M. To classify as an F.S.M., a Scientologist is first required to meet certain security precautions. Some of these requirements include: "complete family background checks, have no traceable addresses, limited and secure friends, a secret place to live, keep no Scientology materials in their home", etc.

To ensure this security, the Guardian's Office often uses elaborate security checks utilizing a Hubbard device known as an E-meter (a crude lie detector). Once an F.S.M. is security cleared he then attends courses and seminars, usually at the National Headquarters in California, for the instruction necessary to run the criminal operations engaged in by the Guardian's Office. One such course is entitled "Confidential Intelligence Course". That one course "outline" is 20 pages in length and describes in subject form the various elements necessary to conduct criminal operations.

The last page of the Confidential Intelligence Course is an example of one Scientology agent completing courses in criminal operations. Some of these subjects include "Brainwashing", Espionage, Counter-espionage, Spying, Terror Stalks, the War, Codes and Coding, Combat Information Center Series (C.I.C.), Counter Insurgency Campaigns, The Spy and His Masters, Building a Cover, Covert Operations I & II, Security and Theft, Art of War, Enemy Names, etc.

This particular course, which contains more than 400 subjects including those mentioned above, plus teaching agents to lie, i.e., TR-L or Training Routine to Lie; effective use of extortion, forgery and blackmail; kidnapping and altering appearances. The seized FBI documents reveal that Scientology primarily emphasized programs and operations to commit burglaries and larcenies with specialization in covert infiltration courses such as "The Strike", a document instructing F.S.M.'s in "12 steps" on how to break in and steal the "target objective".

A still more detailed study on the "tools of the trade" necessary to break in, are taught in a course entitled "Walk Ins". "Walk Ins" provides instruction on use of burglar tools and what to look for and look out for. After the burglary, the course "Security" describes "how not to leave evidence behind". Subjects covered in this course are fingerprints, untraceable phones, light patterns left behind in Xerox machines, saliva analysis and what to do if you get caught. It describes examples of agents whose covers were "blown." Once instruction for burglaries and larcenies was completed, F.S.M.'s then reviewed "Guardians' Orders." Guardians' Orders were normally ordered by Mary Sue Hubbard, L. Ron Hubbard's wife and second in command. Orders, usually many on a daily basis for years, instructed the Guardian's Office to deploy its agents world wide for "attacks" against "targets" (critics or potential critics).

The success of these F.S.M. attacks is evident in a series of documents known as "Compliance Reports" and "Bonuses" given by Hubbard and the Guardian's Office to agents running a successful campaign. A Compliance Report is a report from an agent in the field reporting back to the local Church Guardian, who then reports to National Headquarters. From the national level a summary report would be sent "uplines" from the National Headquarters to L. Ron Hubbard and Mary Sue Hubbard, now Misgavage and Starkey.

The following is just a small sample of the training of these operatives.

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

SECRET

25 March 1977

All concerned

BI staff (Board of Investigation)

All Sees (Secretaries)

DGI US OFFICE (Deputy Guardian International)

Via: DDGI US

RE: RED BOX

Dear All,

This is to introduce into BI US the complete red box system. Most of you have heard of this earlier - I will now explain it in detail.

First of all, all data that is red box data, has to be pulled from your areas. The complete definition of Red Box material is attached.

Secondly, you must ensure that none of your juniors (for those of you who have them) have red box data in their areas.

All the red box material from your areas must be centrally located, together and in a moveable container (ideally a briefcase), locked, and marked.

When this is done in each area, we will divide up the amounts and deputize persons in the area to be responsible for its removal from the premises in the case of a raid. This procedure will be drilled. This procedure will stay in at the new location.

'Please have all this data sorted and located in proper container by Monday night March 28. I will then divide up removal duties, and we will drill it Tuesday night just before the all hands.

Love,

Judy

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

RED BOX DATA INFORMATION SHEET

1. What is Red Box data?

(a) Proof that a Scientologist is involved in criminal activities.
(b) Anything illegal that implicates MSH, LRH.
(c) Large amounts of non FOI docs.
(d) Operations against any government group or persons.
(e) All operations that contain illegal activities.
(f) Evidence of incriminating activities.
(g) Names and details of confidential financial accounts.

2. Where is Red Box data kept?

(a) Out of date material or finished cycles that can be shredded should be.
(b) Large amounts of red box data that is not needed for day to day function but cannot be destroyed is located with all our NON FOI docs - and can be called for via CIC.
(c) Small amounts of data that must be kept on hand due to security and frequent use - is to be kept in a briefcase locked up - and is to be marked. (In BI office area.)

3. How is Red Box data, kept on BI premises, cared for?

(a) This data will be picked up and carried out of the building by `owner' immediately upon notification of a raid, search warrant etc.
(b) Persons carrying this data (as few as possible) will leave the premises and only return when they have called in and received an "all clear".

(Details of who goes where with what data will be sorted out later - and drilled.)

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

DG 1 US

8 July 1976

cc: Sec Off

cc: DDGUS

DGUS

GENERAL CATEGORIES OF DATA NEEDING CODING FOR BI

1. Incriminating, undercover activities and the like. This breaks down into the following areas.
   a. Violations of our status as a tax exempt, non profit org.
      1. Evidence of the C of S lobbying.
      2. Evidence of the C of S engaging in political activities - proposing legislation, supporting candidates.
      3. Evidence of legal or control ties to the B6 groups. Such as a program to get various B6 groups to propose a bill.

   b. Subversive activities.

      While we do not carry on any of these activities, there would therefore be no evidence of such - we should ensure that we do not word particles in a way that makes it look like we do. This also falls under #4 below.

   c. BI confidential projects and actions.
      (a) Disinfo covert Ops etc.

   d. Money deals that might provoke government tax offices.
      (a) Large transfer of funds out of the country
      (b) Missions burying or hiding income, setting up false accounts, using Msn funds to finance a profit making loan company owned by the mission holder, etc.
      (c) Basically anything that is in violation Of our exempt status as non profit org.
      (d) Other confidential financial deals as fall into this category of provoking interest in our finances.

2. Some traffic on BI flubs.
   a. Strategy for handlings.

b. Apparency of violation to the above points.

3. Things that we do not want connected to LRH or MSH. This we handle by coding their names.

4. Words or actions that tend to dispute the fact that the C of S's motives are humanitarian: i.e., harass, eradicate, attack, destroy, annihilate, cave in, entrapment, stir up the opposition.

   a. Most of the instances that would be described this way can also be reworded and not cause any question re our motives. In other cases, say a specific target ...

5. Actions of confidential corporate tax bodies, tax strategy, some BI money CSWS, and occasionally names of accounts.

6. Admission to unpunished crimes and/or incriminating data. This would mostly come on personnel lines. CSWs etc.

7. CONFIDENTIAL, SECRET, etc. TYPE TITLES AS HEADINGS ON PARTICLES.

   For this there is an established code:

   CONFIDENTIAL = FORMAL
   HIGHLY CONFIDENTIAL = VERY FORMAL
   VERY HIGHLY CONFIDENTIAL = INFORMAL
   SECRET = FIRST CLASS
   TOP SECRET = TOP CLASS
   RESTRICTED = LIMITED

   The reason for this is to label a particle as Secret and send it through the mail lines will attract the attention of any Customs inspectors.

8. Another way we catch the eye of Customs is by capitalizing the names of intelligence type groups such as CIA, IP, SECRET SERVICE and names of Government agencies.

   The handling on this is to avoid using the names at the top of the page or in headings, or in paragraph headings. And, typing them in small letters, ip, cia, secret service.

9. When a coded dispatch is sent between orgs all cc's are to be written on the Original but only one copy is sent - to the original. He then decodes the particle and sends cc's to all terminals named on the particle, the same day.

10. Things that we do not want connected to the C of S: Secret PR and BI front groups.

11. Anything that gives actual evidence of Scn being in Legal control of any B6 type groups.

    These groups are

    a) Applied Scholastics

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

GUARDIAN ORDER
GO 2034
DOs/AGs 17 September
1976
DGIs/AGIs
BrII Dirs BI
SEC OFF

THE CORRECT USE OF CODES

To ensure that coding is done correctly, with the correct subjects coded and overcoding avoided, the following steps are laid down:

Codes are used for the following general headings:

1. Incriminating, Undercover or disinformation, covert operations and the like. Incriminating activities would include things like lobbying where this is inhibited in non profit corporations, also money deals that might provoke government tax offices.
2. Things that we want unknown as connected to' the C of S: secret PR and BI front groups.
3. Legal, PR and BI traffic on BI flubs.
4. Things that we want unknown LRH or MSH connected to - this is handled by coding their names.
5. Words Or actions that would tend to dispute the fact that the C of S's motives are humanitarian: i.e., harass, eradicate, attack, destroy, annihilate, cave in, third party, spreading rumors, entrapment, trap or entrap, stir up the opposition.
6. Actions of confidential corporate tax bodies, tax strategy, some BI money CSW's, and occasionally the names of accounts.
7. Anything that gives specific and actual evidence that scientology is in legal control of B6 type groups. These are groups that are separate legal entities to the C Of S.
8. Admission to Unpunished crimes and/or incriminating data. This would mostly come on personnel lines.

In addition to the above there are certain things that get government Customs upset and more curious about what is in the mail pack. These are such things as "CONFIDENTIAL" "SECRET" "HIGHLY CONFIDENTIAL" "TOP SECRET" HIGHLY CONFIDENTIAL" "RESTRICTED", etc. written across the top of the particle.

To handle the use of confidential, secret, etc., type titles, the following will be substituted:

CONFIDENTIAL		FORMAL
HIGHLY CONFIDENTIAL		VERY FORMAL
VERY HIGHLY CONFIDENTIAL	-	INFORMAL
SECRET		FIRST CLASS
TOP SECRET	-	TOP CLASS
RESTRICTED		LIMITED

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

GUARDIAN ORDER

GO 1150 7 May 1974
DGs/AGs
DG Infos &
DAG Infos

CONFIDENTIAL
INFORMATION BUREAU STATISTICS

As the above has been the subject of much misinterpretation and misunderstanding the following is issued to clarify the definitions of Connection and Incident.

CONNECTION

A Connection is:

A. Any person or group in close connection to a subject under investigation relevant to the subject's environment in P.T. or at any point in the past (see below),
and

B. Any link, familial, social, economic or professional found between a person of interest to Intelligence or under investigation and any established enemies, potential enemies, the seven areas or key members of the seven areas.
The seven areas being:
1. Press and Media
2. Intelligence
3. Psychiatric and Mental Health Groups
4. Professional Medical Associations
5. Financiers, Banking
6. Public Relations Groups
7. Drug Firms and Associations.

Given that Mr. X is under investigation in category A, connections include:

1. X's immediate family - mother, father, brothers and sisters, children, spouse(s).
2. X's immediate juniors and seniors at work.
3. X's fellow Directors or partners if in a company or business.
4. Any group, society, business, that X is involved in.
5. Fellow members of X in any committees or small formal or informal groups not exceeding 20 in membership (but not all the other members of a large group).
6. Fellow officers of any group X is an officer of.
7. Anyone that X or another describes verbally or in writing as a friend, associate or colleague of X.

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

GUARDIAN ORDER

GO 907
Those Concerned

22 August 73

CONFIDENTIAL
INTELLIGENCE ESTIMATIONS AND PREDICTIONS

When an agent or operative turns in summaries or documents, those are poured into the main Intelligence Files and any "special tank" that is of current interest.

These main files or "special banks" can be made to operate like computers without the bother of electronic liabilities.

Modified only by errors of concentrated attention where none should be going or omissions of areas that should be under collection, these files or "special banks" will divulge new data.

Here is where we leave the subject of Intelligence Reports (Use HCO PL 25 April 1968, Intelligence Actions) and enter the field of ESTIMATION AND PREDICTION. (See GO 784 Intelligence, Its Role 8 June 1973).

A main file is where everything is filed. A "special bank" is a separate file where data is ADDITIONALLY AND ALSO filed relating to an exact subject.

When filing and cross-indexing is kept up to date (and it always must be) it is now possible to begin the work of ESTIMATION.

This is done by examining the main files and locating the fattest folders related to any one group of subject. Let us say one is just now interested in dog catchers. The cross file index, if properly prepared, will show that several dog catchers are in the main files. One simply pulls their files from the main file, leaving a dummy to catch new filings and to show where the main file is, and makes a "special bank". This is now the Dog Catcher Special Bank.

Now if you look at the above paragraph again you will see that SOMEONE had to say that "we are now interested in dog catchers". This in essence is an ESTIMATION in a crude form. One noticed by general observation that there simply seemed to be a lot about dog catchers lately getting into the main file. So the head of the section being alert decides that there might be something growling in that area. So he rapidly makes up a "Special Bank" of all files that seem to be concerned to some degree with dog catching.

Noticing that we should be looking at these dog catchers is what could be called "flair". It's a "Hey, looking this over we seem to have a lot of dog catchers lately, so I better get some data on them and make an estimation."

No file or computer can actually THINK. It can however be so arranged that QUANTITY begins to show up around certain names and that a casual examination of those names shows they seem to have dog catching in common.

So an Estimator, working the files routinely, having noticed this, would make a "special bank".

The "special bank" is not very elaborate. It can be as crude as simply spreading out the folders on a desk and looking them over FOR THINGS THEY HAVE IN COMMON OR NAMES IN COMMON TO THEM.

It can be as elaborate as making a new card index for every name in those files and what file they came out of; then filing these cards in alphabetical order. As one has taken EVERY name out of each file in turn and put each on a separate card, it is obvious that when one then puts them in alphabetical order, the names in common to two or more files will occur as two or more cards.

If agents are trained to collect all names and connections of names on every investigation and if these names are supplemented by adding in directories, and if filing has been kept up so that a file exists for every name, when you choose files for a special bank they will be the fattest on that subject. And when you work the special bank over again, you will get the precise common denominators of people that run through several files.

You can now say, "Get me more data on Mr. Plow, Mr. Row, Mr. Bow and Mrs. Snap" and when that data comes in (and is added to main files but especially to this "special bank") you will suddenly find yourself expanding ABOVE the level that your special bank was at before. In other words, you have found new horizons.

You will find if you do this that Mr. Plow and Mr. Row are just goofballs or dogmeat sellers, that Mr. Bow died last year and that Mrs. Snap is all you have left.

So we look up Mrs. Snap even further, "Hey, go look over Mrs. Snap again" and we suddenly find she was receiving money for a fund called "Kennel Support" but was actually the head of a dog catcher ring.

We can now PREDICT.

If we are out to handle the dog catchers we will have to work on Mrs. Snap to get her to reform.

We can write up a pgm like this:

PREDICTION: DOGS WILL CONTINUE TO DISAPPEAR.

"The situation is that dogs are getting caught."

"The WHO is Mrs. Snap."

"The following programme based on best advices should be carried out:

"1. Confront Mrs. Snap and get her attitude..........etc".

One needn't elaborate for it is obvious that many ways exist to legally and ethically persuade Mrs. Snap to give up her career of crime.

The tools one is using consist of looking for people or groups that are themselves outpoints. This is about all the relationship this has to the Data Series.

WALK-INS

A walk-in cycle goes generally as follows:

1) You must have a means of access to the building you are interested in. In a government building this almost always means either a government ID (or going in with someone that has a government ID), or an excellent suitable guise. A private building may be as simple as signing in.

   When signing in to either a government or private building, the signature should be scrawled and the destination should not be your actual destination. Except in rare cases it is usually sufficient to say you are going to the library or some such place.

   You should have a story already made up that will be plausible should you be asked what you are doing. This story also has to be very flexible or else you have to have different stories for different stages of the walk-in. A story that you would tell a guard on your way into the building may be entirely inappropriate if you're caught with your hand in the file cabinet. And it will make a difference if the person questioning you is a cleaner, guard, employee, and where you are, what you're doing, etc. So think it out well before you go in.

2) Locate a safe space in the building where you can sit down and relax and talk without feeling paranoid.

   This can be a library table, an empty office - whatever looks good to you, and that you would feel comfortable with. Lots of times in a walk-in you'll have to sit around and wait a couple of hours for your target area to clear out. If you're not comfortable in the area you're waiting in, the rest of the cycle can go pretty rough.

   While you're looking for this space you also have to really assume the beingness of the type of person you're alleging to be. For instance, if your story is that you are an employee of the organization you are in, you have to feel that you are an employee. If a cleaner walks in on you or a guard asks you a question you have to approach your response and manner of response from the viewpoint Of your beingness. If a cleaner walked in on you in your office at the org you'd probably say "Hi" and go about your business. You wouldn't get startled or upset or make some dumb excuse and run out of the room.

3) After you've located a safe space and are relaxed in it you should go out and get familiar with the building.

The first thing you have to locate is a Xerox machine because if you can't copy the documents there's not much sense in being there. Also, you don't want to have already obtained the file and then have to waste time in finding someplace to copy it.

(Note: There is always the alternative of taking the file out of the building to copy. I very seldom do this unless I have to. I much prefer to copy it in the building because you add too much time to the cycle by traveling to another building. You also have to sign in and out again with the guard, which looks somewhat odd to an observant guard.)

Most government buildings have an excess of Xerox machines. They are usually easy to find. Even most private buildings have a Xerox machine in any large office.

You want to choose a machine that is located away from the area that you will be obtaining material from.

In a large government building you simply go to a different divisional area from the target area and find a Xerox machine.

If you're in a private building, chances are there are many different organizations in the building. Go to another organization or suite of offices and locate a Xerox machine there.

Often times you will find the Xerox machine locked. If you are familiar with Xerox machines you'll know where the "Main On" button is.

(Note: It's a very good idea to be thoroughly familiar with all manner of Xerox, SCM, etc., copiers so that you can easily change paper and toner, clear jams, etc.)

It will be protected by a locked cover but should be accessible by lifting up or pulling out a corner of the cover. For instance, on the Xerox 7000 you simply lift up the corner of the cover nearest you as high as you can without binding the cover, and stick a finger (or a long instrument like a letter opener) in and push down the "Main On" button which is located to the front, just a few inches in front of the middle of the machine. Nearly all copiers are accessible with some variation of this, it just takes looking and experience.

Ensure that you can turn on the machine, it works, and that you have sufficient paper. Then leave the machine on and leave the room.

4) Locate the target area. You should already know the room number before going in. Walk past the room, observing

all rooms in the area for any lights or other indications that they are occupied.

If it is apparent that the room, or rooms close to it are occupied, then go back and wait and check again in 30-45 minutes. But don't get into making a lot of trips past the area.

5) When the area is clear then go to the room door and try it to see if it is unlocked.

(Note: It isn't unusual for room lights to be left on and the doors closed with no one in the room. If you have any feeling that someone might still be in a room then go up and knock. If someone answers, open the door and ask them for a match or to use their phone, or some such. Also, use the opportunity to look at the door latch so that you know its configuration.

If the door is unlocked, just Open it and go in.

If it is locked then you have to figure out a way in. The most successful ways of opening a locked door have been variations on the credit card.

This can be used if the latch is slanted or curved going into the door jamb:
[hand-drawn sketch of types of curved latches]

If the latch is straight then the lock will have to be picked.

[hand-drawn sketch of the type of latch that will have to be picked]

If you have a curved or slanted latch (this is the most common type of door latch) and there is no door stop (that

[hand-drawn sketch of door, showing jamb and stop]

strip of wood that the door closes against) then it is a straight in shot with a credit card type tool (a piece of straight sheet metal is best). You just slide the tool in between the closed door and the jamb and slide it up under the latch - the door should open. In doing this it is usually best to pull the door towards you as it relieves pressure On the latch and makes the card easier to slide up. (See page 3a) [?]

If there is a door stop (as happens most frequently) then you can't dust stick a credit card straight In - it has to bend around the corners:

[sketch of door frame showing door, jamb, stop, and where credit card would go]

The best thing is to manufacture a permanent tool rather than trying to bend up cards. You should obtain a thin sheet of metal and cut it out in the following shape:

5796

[Sketch showing shape and dimensions of tool described in text. Shows sections A, B, and C referred to in text below.]

The curved shape assists in raising the latch better than a straight-edge would do. The "b" section should be about as long as the average door stop (about 3/4", but measure it for yourself). The '"c" section should be as long as will comfortably fit into your hand. The "a" section should be about 2-2 1/2" long, but only a portion of it will actually be working on the latch. Note that the slope of the "a" section drops off sharply at the beginning.

This tool is then inserted at the bottom of the doorway, slid up the doorway between the jamb and the door - thus opening the latch. If you have trouble inserting the tool, use your foot and push in the lower corner of the door as far as it will go. This should give you sufficient room to insert the tool. (See pages 4a & 4b).

It should be noted that you will need two tools - one for right hand doors and one for left hand doors.

As with the straight in shot it is usually best to pull the door towards you to relieve some of the pressure on the latch.

Often you will have to move the tool back and forth several times (or more correctly - up and down) to catch the latch correctly, while moving the door back and forth. Its a "feel" thing that you need experience on.

Now very occasionally you find a latch that slants back into the room rather than out - that if you could look down on the latch from the corridor you would see

[sketch of what you would see]

rather than the normal ***[sketch of a normal latch]***.

I have only found that this occurs on doors without stops.

In this case, the tool, or credit card, won't work because the slant of the tool or the credit card is going in the wrong direction. You have to get something behind the latch to pull towards you.

Therefore, you should also carry about a 5 inch strand of *flexible wire. The wire should be woven strands rather than one thick strand. The best I've found is the type of wire used to hang pictures that you can pick up at most hardware or drug stores.*

Take this strand of wire (assuming there is no stop on the door jamb) and bend it in a semi-circle. Slip the wire under the latch and maneuver the top of the wire out above the latch. Grasp both ends of the wire firmly and work it back and forth, pulling both ends towards you - and thereby working the latch out of the door jamb:

[sketch showing door, latch, wire, and door jamb]

You have to be careful not to go too fast on this or you'll slip the latch out of the door jamb and have it slip right back in after the wire clears it.

These methods of opening locked doors have worked about 75% of the time. There are occasions where they won't work due to doors too tight, un-oiled latches, etc.

There are also many odd configurations of latches and it helps to know exactly what the latch looks like. You can often find an unlocked door in the area, examine it (the latch), and try your tool out first on that door to get the feel for slipping that particular type of latch.

You'll also very occasionally run into doors with two locks on it which can be slipped. In this case you need two tools. Insert one of the tools from the top of the door, slip the latch and hold ***[it in place?]. Then insert the second tool from the bottom of the door, slip the second latch and the door should open.***

If a door won't open at all with this method, there is a very good chance (especially in government buildings) that there is a suite of interconnecting rooms adjacent to the room you are interested in. In this case, just try an adjacent door and go through the same routine again. If you have a number of different doors that could lead you to the same room, check the amount of "play" or looseness in each door and try the one that is loosest first.

Also, an old successful action if you know you are dealing with a suite of rooms, is to go into the rooms during the day and unlock one of the locked doors. It is likely that a door found locked during the day remains locked all the time and that other doors in the suite are used as the entrances/exits. The 'locked" door is likely to not be checked each day on the assumption that it will stay locked. The best doors to choose for this are ones that tables, chairs, etc., have been pushed up against, as these doors are obviously not used as entrances/exits.

Of course, when you go into the suite of rooms during the day you should have a well worked out suitable guise that will logically explain your being there, Or you won't get close enough to the door to unlock it unobtrusively.

One such suitable guise that was used involved going into the offices during the day with a clipboard and informing the secretaries that "Facilities Management" needed to check the locks on all doors. We had one door stay unlocked for three months using this technique.

By this time you should be in the office. If you're not, you either need more practice or you'll have to pick the lock.

The advantage, by the way, of slipping a latch as opposed to picking a lock is

a) to slip a latch takes 2-10 seconds compared with at least several minutes to pick it (unless you're very good), and

b) you don't need as much training and experience.

6) Once inside the office you have to locate the file you are interested in.

Most often the file will be located in a file cabinet and probably 50% of the time the cabinet will be locked.

As soon as you run into a locked file cabinet, immediately check the top middle drawer of every desk in the area of the cabinet and you'll almost surely find the key. If you can't find the key there, you'll have to search more thoroughly in different desk drawers. These keys have also shown up in file card boxes, taped to the cabinet, and locked in safes. But, I have never found a locked file cabinet and not been able to find the key in the room.

Combination safes occur infrequently. Like file cabinets, the combination is almost always laying around somewhere in the room. Again, check the top middle desk drawers of any desks in the vicinity of the safe, looking mainly for an index card sized piece of paper with the combination listed under "safe", "file", and "lock" , but oddly, never under "combination". If you don't find it there you'll have to do a thorough search of other drawers and desk areas. There has been only one occasion where we weren't able to locate a safe combination - they are pretty easy to find.

Also, make sure that you know how to dial a safe combination. The most normal are 4 turns left (this is actually three times past the number and the 4th turn stops at the number), 3 turns right, 2 turns left, and one turn right to zero. You then turn the inside knob of the dial all the way to the right while holding the dial at zero:

[sketch of combination lock dial and inside knob]

When this is done then turn the dial as far right as it will go and the safe will open. On safes with no inside dial, just don't stop at zero. Go all the way to the right on the last turn and the safe will open.

When you're finished with the safe make sure to set the dial back where it was before you opened it.

By going through the file cabinets, safes, desk drawers and desk tops you should now locate the file you are looking for.

One point to keep in mind while searching for the file is to keep the area (and the file when you find it) free of fingerprints. Optimumly you should wear gloves. If this is not possible and you have to touch something, do so with the sides of your fingers or make sure that you smudge the prints. Prints can be easily smudged by giving your fingers a half turn as you withdraw them from the surface.

When you locate the file(s) put them in your briefcase.

On your way out of the room, if the door was locked when you went in, make sure that the door is now unlocked as you'll want to get quickly back in when you return. There are normally buttons on the latch plate of the door that push in and out:

[sketch of latch with buttons to lock and unlock the door]

Push in whichever button is out and check the outside doorknob to be sure it is unlocked, and then leave, closing the door behind you.

One other point when going into the room - often you will be working at night and you'll need a source of light. It is inadvisable to turn on lights unless you are thoroughly familiar with the area. You have no way of knowing who can see them especially if the office has an outside window. Instead, you should carry some type of small penlight flashlight. The batteries in these usually wear out after 30 minutes or so, so make sure you have sufficient batteries with you.

7) Return to the Xerox room you originally picked out (or, if absolutely necessary, go to an outside Xerox machine).

It is best, if possible, to lock yourself into the Xerox room so that no one can easily walk in on you unexpectedly.

One person should Xerox while the other person puts the material back in the file, therefore, start Xeroxing from the last sheet in the file folder.

You have to keep the files and papers clean of prints, so, if at all possible, wear gloves. If this can't be done then make sure you handle all pages with the sides of your fingers and your palms. This is easy to do after you get used to it.

Usually there is a title written or typed on the file folder. This should be Xeroxed also so that you can keep the files separated.

If this is an "active" area - i.e. there is some type of current case going on and new material will be added to the file, it is wise to put a small pencil mark (inconspicuously) on the latest page in the file that you copy so you'll know where to start next time. Also, if there are a large number of separate files, you should mark them also inconspicuously so that you will know they have been done should you or someone else have to come back again.

Although I have never found it a problem, you should know that there is an internal counter in virtually all copying machines that will record the number of copies you make.

Also, once I ran across an agency which issued counting device to their employees as an economy measure to cut down on the use of the Xerox machine. These devices are rectangular in shape - metal cases about 4"x2"x3/4" - that have a counting mechanism showing through the front "window" of the case. Without having one of these devices you can't operate the Xerox machine. To operate the machine you place one of these devices into a rectangular hole on the control panel of the machine and when so placed, the machine will operate (after it is turned on, of course).

If you run across this situation you'll have to search the deck tops and drawers in the vicinity of the machine to find one of these devices. This should be done before you search for the file(s).

When you finish Xeroxing make sure there are no copies of yours or of theirs in the machine, and turn it off.

(Remaining lines illegible)

5801

PLAN FOR DISGUISE

To create the image of an aging guy wanting to look hip as a means of regaining his youth a bit.

Mock-up would be as follows:

1. A somewhat mod wardrobe, bright colors, open necks, necklace, rings on fingers, cigarette holder, tan.
2. His head will be shaved and then NAIR'd to create "bays" and the impression that he is partly balding. This would involve shaving and plucking to create bays and then using Nair on bald area and using a sun lamp.
3. The contacts would be rechecked with the doctor who gave them out to see if they can be worn more often and for longer periods - debug. If not different frames would be gotten for his glasses.
4. His tooth would be capped.
5. He would lose some weight (or gain it) as he wished. Preferably lose some weight.
6. His eyebrows would be lightened and plucked. His hair done a light blonde, side burns grown a different length.
7. Earth shoes would be gotten to change the posture.

These are the contemplated changes for Jeff.

["WALK-IN" DRAWINGS PAGES]

[next page is a full-page drawing, showing wall and door, with the following instructions]

Push here with a foot to get extra room to insert tool.

Once the tool is in position then slide it up the side of the door/door jamb to the latch.

Use this extra space to maneuver the tool between the door, the stop and the door jamb.

[Next Page]

[full-page drawing, view from above of door, latch, door jamb, and credit card, showing where to insert the credit card]

The credit card is simply inserted in the space between the door and the door jamb and used to slide the latch out of the door jamb, working on the slanted part of the latch.

[Next Page -- handwritten "Page 4b"]

[full page drawing, showing detail of how to use homemade tool to force door latch]

Front and top view of how the slanted tool works on the latch. As the tool is moved upwards, it forces the latch out of the door jamb.

Local paper cover

1. Minimum requirement -- 1 weekly column of about 500-600 words typed double space (format attached) delivered personally on Monday afternoons to managing editor. Plus visiting with Managing editor and keeping in comm with him.

2. With this in it is easy to have paper send in forms to get DC Police Dept Pass.

3. You can then visit the State Dept. correspondent's association and for 10 dollars join.

4. You can then put in for a state dept. ID which will give access to state dept. building 24 hours a day and will serve as a government ID giving access to many other buildings -- including Treasury Dept.

[several lines are blacked out]

6. You can put in for congressional gallery passes but do not under any circumstances put in for White House Press credential as this will put you under scrutiny of Secret Service and into their computer files.

6. Press ID is strengthened by articles published. Typical sequence, do interview for data, assess where person at, white article which furthers what they would want to see furthered, get printed in paper, clip out two copies, paste them on paper with masthead of paper and deliver or send them to person interviewed -- this will virtually assure future access as it keeps exchange in.

7. Police press card good in many areas even in other cities. Be sure you know address and telephone number and that circulation of paper is 20,000 and that it is a community newspaper and a weekly. It is well worth indicating that the paper is not an underground paper as the name tends to imply this and put people off.

8. One side use of ID is that you can do favors for people -- i.e. senate aide needs to check on something, having trouble easy enough to get data and give it if it will strengthen comm line, etc.

9. Press ID can also be used to get complementary tickets to various events and entertainment, give free access to conventions and annual meetings (ex HAMH convention, etc.)

10. Remember that ID a valuable resource not to squander or unnecessarily put it at risk.

SUITABLE GUISE I/C

Suitable guise I/C is responsible for the supervision and completion of suitable guise research assignments.

This includes government interviews, telephone survey's and interviews and any activities which would go into building the cover required.

Responsibility extends to the following areas:

1. Receive duplicate pgmn pjct and orders for suit guise research.

2. Plan out how they will be carried out as rapidly thoroughly as needed while maintaining security for both the investigator and the Church. The church at all times, the investigator at all times unless the situation is of sufficient urgency as to demand the sacrifice of a previously developed cover.

3. Assign personnel to carry out work or do it self if no personnel available.

4. Recruit suitable guise FSM's.

5. Hat them.

6. Recruit staff for same and hat.

7. Plan out and keep in ongoing programs to build a variety of useful suitable guise covers.

8. Be constantly alert to demands of security so that security is maintained

9. Ensure that there is a compartmentalization of covers used so that the blowing of a single cover will not jeopardize suitable guise activities in your area.

10. As a warning note if you do have to get involved in broad (national) type cover activities make very sure that the personnel on them have some sort of backup cover and that the national type cover is used a supplement to activities and that the personnel that work on it are kept apart from the others as NATIONAL TYPE COVER OPERATIONS ARE HIGH RISK OF EXPOSURE DUE TO THE NUMBERS OF TERMINALS INVOLVED AND THE AREAS THEY MUST COVER AND THE BROAD DEMANDS TO WHICH THEY ARE OFTEN SUBJECTED.

11. As a present ongoing program maintain the liaison with the local paper and ensure that there is at least one staff member equipped with good press ID. Work to maintain and improve that staff members press cover with membership in Capital press club, contacts with other papers, articles written and printed, weekly column done, etc.

Another thing that excites government Customs is the names of intelligence type things such as CIA, IP, Police, Secret Service and names of government agencies within the country concerned. This is best handled by avoiding the use Of such names at the top, or in titles of dispatches or issues dealing with these, or in prominent places where the name stands out in the issue such as paragraph headings. When naming such issues in the body of a sensitive issue do not capitalize the issues of names as this makes them less eye catching, i.e., cia, ip, police, secret service.

When coded dispatches and reports are sent between Orgs all cc's (carbon copies) are to be written on the dispatch, but only one copy is sent and this is to the person being written to. This person is then responsible for getting the dispatch decoded, at the latest that same day, and distributing the decoded version to all the persons named as cc's.

The Security Officer of Branch II Dir. is to ensure that all GO (Guardian Office) staff are made familiar with the above points and that coding is being done correctly and comm lines are not being tied up with unnecessary coding.

The Security Officer or BrII Dir. is to sort out what actions would fit in with categories one and seven. This is' to be done in association with Legal. This Guardian Order is not to be distributed to staff when making them familiar with what Should and should not be coded.

Dick Story
Security Officer WW
for Hermann Brendal
Int'l Dir Sec WW International)
for Mo Budlong
DGI WW
for Jane Kember
The Guardian WW

Glossary:
DG's/AG's = Deputy Guardian's /Assistant Guardian's
DGI'a = Deputy Guardian's Intelligence
SEC OFF = Security Officer
C of S = Church of Scientology
PR = promotion
BI = Bureau Intelligence
LRH = L. Ron Hubbard
MSH = Mary Sue Hubbard
CSW's = completed staff works (reports written up)
GO = Guardian's Office
cc's = carbon copies

B6

IP

Br II Dirs BI =

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

INTELLIGENCE

Intelligence is mostly the collection of data on people which may add up to a summary of right or wrong actions on their part.

It is basically a listening and filing action. It is done all the time about everything and everybody. Then one day some random data make a summation that can be used. "It all adds up." But if one never collected data, there would be nothing to add up. Hence, intelligence consists of noting data about the activities of people from all kinds of sources. Joe is now working for the Daily Worker. The State Department won't grant Pete a passport. Isabel left Texas owing money. It's all grist to the mill of intelligence. Carefully remembered or filed and cross-indexed, such data tells its own story some day. If we had a folder for Joe, we'd scribble on a slip of paper, "Works now (1959) for Daily Worker - a Communist paper". A few weeks later, another scrap of paper is dropped in: "Taking B. Scn. Course Feb. 59". A few months later: "Foe moved in to live with Pete". We look up Pete. Obviously, Pete is a Commie as he can't get a U.S. passport. September 1959 we learn that Joe is asking for a job in the Senate Office. We promptly tell Seattle, "Rat-poison. Forget Joe.

If we kept files like that we'd keep them like that. Some day we may have to. Today we do it by memory. So we listen. We add up associations of people with people. When a push against Scientology starts somewhere, we go over the people involved and weed them out. Push vanishes.

Using intelligence to tell our friends from our enemies and acting fast is why we have stable organization now where he had shambles before. It isn't better organization so much as more peace bought by more alert intelligence. We know our enemies before they hit. We keep them out of important positions. When we accidentally put one into a key post and he starts to flub, we shoot quick and get judicial afterwards. And we then add up who his friends and associates were.

Intelligence alertness, even when we have no files, pays off in peach, growth, and progress.

APA and OCA graphs tell their stories on people. Only the ones whose graphs don't change under processing have been found to be real menaces to Dianetics and Scientology. They have overt acts and bad intentions against us the they can't talk to the auditor about them, they feel. So they're hanged. Every one of twenty known cases who were evidently paid money to smash Dianetics or Scientology organizations, including Hart, Purcell, and Van Vogt, had hung graphs. No change occurred in any of these cases for five or more years of known activity, despite all processing! So an unchanging profile over years of processing almost adds up to "dangerous person - has bad intentions toward Dianetics and Scientology.".

Conversely, people who benefit from processing or auditors who get consistently good results on preclears never get snarled up enough to attack us. Therefore intelligence has its bright side. By facts heard plus profiles seen, we know our friends.

Intelligence is therefore that activity which collects data and keeps it adding up so that we know our foes from our friends and so that we can act to separate out the sources of trouble in any given situation.

Organizations with bad consciences usually look on HCO personnel as intelligence people. So HCO personnel might as well realize it, too. One small HCO hat is intelligence - know our friends and our enemies and what they are doing.

INVESTIGATION

When things go wrong and we don't know why already by intelligence, we resort to investigation.

When we need somebody haunted we investigate.

Investigation is the careful discovery and sorting of facts. Without good investigation we don't have justice, we have random vengeance.

When we investigate we do so noisily always. And usually mere investigation damps out the trouble even when we discover no really pertinent facts. Remember that - by investigation alone we can curb pushes and crush wildcat people and unethical "Dianetics and Scientology" organizations. It's almost funny. We sometimes learn nothing useful and yet because people heard we were investigating their consciences sent them into headlong flight or sudden collapse. There's power in the question alone!

Here is an example. There's bad morale in a central organization. We don't know why. We try everything we can to up units and ease difficulties and yet there's bad morale. So we investigate noisily. Remember, intelligence we got with a whisper. Investigation we do with a yell. Always. Modern copy don't really know this. They investigate with whispers. Doesn't pay. Why sneak up when pouncing is the only thing that serves us? After all, if it hasn't been whispered to us already and we have to investigate, why keep whispering?

In the low morale matter, we think over the most likely suspects and summon them to see us. We ask them why they're talking the way they are. What's wrong anyway? We call them in one at a time. We use the E-meter. "What have you been doing to us?" And you sort it out.

Investigation to us in Scientology is a fine art. It's like auditing. If they won't take a meter test, you know they're guilty. If they do, you can watch that needle dip a "Yes" every time you're right even when the suspect won't say anything verbally. You generally find that Joe is hoping to start a clinic in the town and thinks of the organization as a rival - if the central organization got knocked out, this knucklehead thinks, he'd be all set. So he's been discouraging staff and starting rumors in the town.

Did you ever realize that any local viciousness against Scientology organizations is started by somebody for a purpose? Well, it is. Look at what we do. Look how dedicated staff is. How hard they work. And yet somebody feels we're evil? No, rumors aren't "natural". When you run them down you find a Commie or a millionaire who wants us dead and his own clinic up or a group member who is also a member of the R.C.

You don't rest when bad rumors are about. You investigate, you run them down. You find amongst all our decent people some low worm who has been promised high position and pay if we fail. Don't discount this. In one instance $500,000 was paid in cash to a man to wreck Dianetics. He almost made it. Wichita Kansas, Spring 1952. (But by intelligence and investigation we cost him his shirt and his spare vest as well.)

In cross questioning people, it is as valuable to know what they've been told as what they've said. "What bad things have you heard about the HASI?" and "What have you said?" are the usual questions. When you get on a line of data follow it right through.

Get the names. Write them down as you get them. Sort them out with what you already know about them.

[EVIDENCE FROM AUTHORIZED FBI SEARCH.]

TO: All Bureau Four offices in the US
From: USGO Bureau Four

THE "SOURCE FILE"

SOURCE FILE - definition - a practical, easy-to-use, record of standard sources which produce standard information; and is set up in the following manner: "This is a file similar to the card directory in a library. Three 3 x 5 index cards should be made out for each source of information and cards should be filed under three separate headings. 1) type of information available; 2) name of organization or record; 3) name of individual who can supply the information. If one organization has available different types of information, there should be a separate card filed for each type. It is a mistake to attempt to rely on memory to keep track of many sources of information and jottings on scraps of papers or notes in a pad or notebook are seldom worthwhile." (quote from "Investigations HAT", by D/G Info US)

Each Bureau Four office should have a Source File.

Following is a list of standard sources and types of information which should be in each Bureau Four's Source File. Much of the following is based on experience in California, and therefore you may find some variations in your area. However, most of these items are in the realm of public information and should be available in your area.

1. LAW SUITS: There are often several areas where these are kept in government offices for different types of law suits. The city and county often keep separate records for their respective jurisdictions. You should find out where all the different indexes are located for the various types of law suits. Also many cities have federal suit indexes. You should know where divorce cases and civil actions are indexed, to name a few.

   Often time an order will come down to check out the general background of an individual. Law suits is an area which should always be checked, so you must know where the Indexes are kept for all the different types of law suits, so you can check a person out for the past 20 years.

2. AUTO LICENSE RUNDOWN: This is a service whereby you give the correct agency a license plate number and pay a certain fee, and they will tell you who owns the car, who finances the car, and vital statistics about the car. In California this is done by the state department of motor vehicles.

3. DRIVERS RECORD: This is a service such as in #2, whereby

you can gain information about a persons driving history, such as tickets, restrictions on his license, etc. In California it is done through the same agency as #2.

4. MARRIAGE, BIRTH AND DEATH CERTIFICATES: These are often located in the same area, like the Dept. of Health, or Bureau of Vital Statistics, etc.

5. INCORPORATION PAPERS: All organizations, profit or nonprofit, usually have to file their existence with the state government. (often the Secretary of State) These Incorporation papers are for public view and copies are available for public purchase. The papers usually state the purpose of the organization, its bylaws and lists the officers or directors of the group.

6. PROPERTY RECORDS: These records usually list people who have bought or sold property. By checking these indexes you can find out if the subject has had property dealings over the years. These are often kept in city or county offices.

7. CREDIT CHECKS: Often large city libraries, in their business section, collect the Dunn & Bradstreet credit checks on various businesses. Some Bureau Fours have made their own contacts with commercial credit firms to get credit reports on individuals and businesses. These will often give valuable financial info on the subject.

8. AUTOPSY OR CORONER'S REPORT: Usually obtainable through the county health dept. Gives detailed information on dead people of interest.

9. CRIMINAL RECORDS: These are often indexed by the persons name as with law suits. The records are often separated into the felony and misdemeanor classifications. You should locate the indexes or any other method available for checking a person's criminal record over a 10-20 year period.

10. BUSINESS LICENSES AND PERMITS: Many types of jobs require a person to file for a permit or trade license with the city, or sometimes the county. Some jobs entering into this category are: barbers, taxi drivers, bars, private investigators, etc. just to name a very few. These are often filed in the city tax and permit dept. You should find out where these records are kept in your area and make note of all the types of jobs which need to file for permits. Thus if you are investigating a barber, you will know that you can go down to this city dept. and get some data on him.

11. REGISTRAR OF VOTERS: As you know, citizens must register in order to vote. These registration papers are public record. Registration forms have changed over the years but they will often tell you the person's social security number, where he was born, how tall he is, his...

12. CIVIL SERVICE EMPLOYEES: Your city and or county offices will have what is similar to a business personnel office where you can call to see if a person is in the employ of the city or county, and what his post is.
13. CITY DIRECTORY: This is a directory much like a telephone book, and is commonly mistaken for one. However, the city directory is put out by the city itself, not by the phone company. The city directory often will list a persons job next to his name, like: "Jones, Bill Pres. of Hog Manufacturers Inc." Also many city directories will have a reverse directory whereby you can get the name of a person and the phone number when you only know the address. City directories can almost always be found in the local city library. Many large cities no longer produce city directories, like New York.
14. REVERSE DIRECTORY: Many companies produce reverse directories such as thus described in #13. The most well known company which does this is Polk Bros. These are usually in libraries and are different from the city directory.
15. BANKRUPTCY PAPERS: These and their indexes tell you if a person has filed bankruptcy. They are often filed in federal offices or the federal courthouse in your area.
16. FIRE AND ARSON REPORTS: These are standard report forms filled out by the fire dept. anytime there is a fire. Arson reports are often filed separately from regular fire reports.
17. INHERITANCE AND GIFT TAXES: Find the local govt. dept. which handles this area. You can obtain information dealing with wills, inheritances, etc. on a subject. If there are any court cases involved with an inheritance such files would be found in the probate court, which is one of the categories which would fit in #1 - law suits.

So these are some of the basic areas which should be covered by your source file. The 17 items listed above point out some specifics and some general areas. A Source File done correctly on the above items would have more than 17 entries, for instance under law suits you should have separate entries for "civil suits", "divorce cases", "probate cases", etc.

So, you see, the Source File is invaluable. Imagine keeping all this data in your head!

The Source File should also be seen as a major portion of the Investigation Section's HAT. It is continuously expanded and kept up to date. And it is constructed for easy use by Investigations personnel. It explains itself, you don't have to tell each person where to go to get an incorporation paper each time you need one. It's all there in the Source File.

The 17 items listed will give you a good basic start. There is no way for Bureau Four US to tell all Bureau Fours what to put in their Source File. The variations and possibilities are infinite, and different states and cities have different ways of doing things.

The Source File will cut your investigating -man-hours down, and will help to increase the speed of your investigations.

Love,

Greg Willardson

Dir. of Investigations US

for

Terry Milner

D/G Information US

P.S. If any of the above items are not available to you in your area, you should make a note of such in the Source File. For example if auto license rundowns cannot be done in your state, your Source File index card on "auto licenses" should say: "a rundown on Arizona license plates is not an available service in Arizona", etc.

CONCLUSION

"If you fail to fight for justice soon you will be fighting for survival."[57] With Scientology you get to do both!

THE PRECEDING INFORMATION ON SCIENTOLOGY'S ACTIVITIES DISCLOSES THE TRUE NATURE OF WHAT MOST OF THE LEADING CULT EXPERTS CONSIDER THE "WORLD'S MOST DANGEROUS AND DESTRUCTIVE CULT."[58] TO DATE, SCIENTOLOGY HAS NOT BEEN DETERRED OR EVEN SLOWED FROM CONTINUING ITS HIGHLY PROFITABLE CRIMINAL OR ANTISOCIAL ACTIVITIES. IT HAS NEITHER "CHANGED ITS STRIPES" (ACTUAL NATURE), NOR ITS REPEATED APPLICATION OF ITS NOTORIOUS FAIR GAME POLICY.

Anyone paranoid of Scientology is not paranoid.[59] The threat is real if you are an important target. Scientology has definitely not "cleaned house" nor are its infamous activities "ancient history and have no relevance to the present time."

Scientology's modern multiple strategies of total covert and overt psycho-terrorism and legal brutality are often more effective in silencing and stopping current adversaries, and in building legends to discourage future adversaries, than traditional physical terrorism, i.e. assault murder etc. There are many things a person fears more to lose or live through than just death or physical injury. *Scientology's bully style legal brutality and psycho-terrorism finds those things and uses them.*

---

[57] Author unknown.

[58] Scientology and Dianetics earn this title because of 1.) Its size, international scope, and an estimated 300-500 million a year in income, 2.) the effectiveness of its sophisticated second-generation thought reform programs which are used to gradually convert its members into inner circle zealots and covert operatives, (See appendices called Scientology's History of Criminality and Coercive Persuasion and Scientology,) 3.) Scientology's terror tactics and other secret policies, and 4.) the actual secret nature of what Scientology is as opposed to what it tries to deceive the public into believing it is. In all of the included appendices it readily becomes clear that Scientology and its feeder organization Dianetics are potentially as dangerous and volatile as the Jonestown and Branch Davidian groups and possibly, in some ways, more dangerous and volatile.

[59] Individuals who have to deal with being a target have developed procedures of their own to deal with legitimate risk assessment. The process partially involves the three occurrence system. In this system the first time something happens in your environment you notice it. The second time something similar or connected happens you notice it a little more closely (but it still may just be a coincidence). The third time you do a careful and full investigation. The third time something happens mathematically is highly unlikely to be a coincidence. This procedure keeps one reacting to the actual harmless coincidences that happen life.

> "In reality the church is a hugely profitable global racket that survives by intimidating members and critics in a mafia-like manner."
> (Time magazine May 6, 1991.)

If Scientology's ruthless, in-and-out-of-the-courtroom tactics which judge James Kolts called a "cynical and unfair use of the judicial system."[60] go unchecked and continue to be successful in intimidating judges, opposing attorneys, witnesses, the media, and members of our justice protective agencies, and sealing hard won court cases it is likely that in the high profit world of national or international corporations, others may also soon begin to recruit and set up their own full intelligence agencies with open ended budgets and imitate Scientology. Why not? To date Scientology has been relatively successful with its "legal brutality" practices in either crushing adversaries, sealing indispensable information, or deterring, eliminating, delaying, or limiting consequential corporate liability.

Joe Yanni was a key attorney working for Scientology until 1987. He defected from the Scientology's legal team when he says he was asked to help church officials steal medical records to blackmail an opposing attorney (who was allegedly beaten up instead, Time magazine May 6, 1991).

From his experience inside Scientology, Joe Yanni now believes the church *"has so subverted the justice and judicial system that it should be barred from seeking equity in any court." Since Yanni quit representing the church, he has been the target of death threats, burglaries lawsuits and other harassment.* [61]

"Scientology critics contend that the U.S. needs to crack down on the church in a major organized way. "I want to know where is our government?" demands Toby Plevin, a Los Angeles attorney who handles victims. It shouldn't be left to private litigators because God knows that most of us are afraid to get involved. "(From the May 6, 1991 Time Magazine article.)

---

[60] From The American Lawyer article, "The Two Faces of Scientology," by William Horne, July\August 1992.

[61] *From Time magazine's May 6, 1991 article.*

Any organization with Scientology's criminal history and policies of abusing First Amendment immunities,[62] with near unlimited funds [63] to accomplish its ends through cocaine warlord-like terror tactics, intelligence technology and "legal brutality" both inside and outside the courtroom, will put our entire system of justice in actual peril!

> "Scientology is both immoral and socially obnoxious... it is corrupt sinister and dangerous. It is corrupt because it is based on lies and deceit and has its real objective money and power for Mr. Hubbard... It is sinister because it indulges in infamous practices both to its adherents who do not toe the line unquestionly and to those who criticize it or oppose it. It is dangerous because it is out to capture people and to indoctrinate and brainwash them so they become the unquestioning captives and tools of the cult, withdrawn from ordinary thought, lining, and relationships with others." Justice Latey, Ruling in the High Court of London

> "Scientology is evil; its techniques are evil; its practice is a serious threat to the community, medically, morally, and socially; and its adherents are sadly deluded and often mentally ill... (Scientology is) the world's largest organization of unqualified persons engaged in the practice of dangerous techniques which masquerade as mental therapy." Justice Anderson, Supreme Court of Victoria, Australia.

Scientology is an organization with no reputation or credibility because it will say anything or do anything to win. It has not gotten better it since its cosmetic change. It has gotten more secretive and worse and it continues to recruit and retain individuals in the key positions who are and reflect Scientology's true nature. The reason it has gotten worse and will continue to deteriorate is that:

---

[62] For details on other similar circumstances which were never envisioned by our constitutional forefathers when they established these immunities for bona fide religions over 200 years ago (such as an intelligence agency operating under the cover of a religious organization or an organization claiming religious sanctuary performing thought reform/coercive persuasion experiments on the public without their informed consent), see particularly, Respondent's Supplemental Brief of November 16, 1990 in Church of Scientology v. Wollersheim, U.S. 89-1361, p.3-4 regarding Scientology's violation of the voluntarism principle. Also see Appendices 1,2 and 3 of same document. For more detail on Scientology's paradoxical twisting of First Amendment religious immunities see Larry Wollersheim v. Church of Scientology of California, Petition for Writ of Certiorari, U.S. 89-1367, p.11-25, Respondent's Reply to Brief in Opposition of April 7, 1990, Appendix A in the Church of Scientology v. Wollersheim, U.S. 89-1361. Also see the other appendices of this document.

[63] The current Wollersheim case is estimated to have cost Scientology somewhere between 50 and 70 million dollars over the last eleven years. Scientology's attempt to overwhelm the justice system with money against adversaries often of blue collar asset availability, also underscores the difficulties Scientology presents in preserving fairness and equitable treatment when using the justice system. Wollersheim's 6-month Los Angeles trial was described by superior court staff as one of the most costly and security-intense in Los Angeles history. (see article on trial demonstrations in appendix A.)

1.) It refuses to stop acting directly and indirectly in immoral, outrageous, and criminal way because it refuses to completely and honestly reject the policies that command, imply and create such actions. And, the reason it refuses to truly and completely reject those policies is because to do so they would have to publicly and openly renounce and reject the psychopathic personality who created such inhumane and barbaric policies in the first place, L. Ron Hubbard. Scientology is incapable of doing this because the whole structure of Scientology is built on the infallibility and tremendous "wisdom" of Hubbard.

2.) It refuses to take its just punishments for past and present wrongdoing. It cannot be wrong because Hubbard cannot be wrong --- so it is trapped in the cage of its own dwindling spiral. Because it is so trapped, its delayed punishment continues to grow and correctional worldwide pressure from former victims builds.

Scientology seems to have no allies except individuals or organizations it pays or organizations carrying on similar activities. Its activities have angered even common taxpayers who read about its base abuse of the religious privledges. The single thing that makes Scientology's activities so despicable to anyone informed about Scientology is that Scientology perpetrates them under the guise and protections of a church. In so doing it would be hard to find anyone who reasonably would believe their tax dollars should continue to go to defend Scientology's illegitimate religious status.

In 1982 at the Supreme Court of Victoria where religious status was denied during its Board of Inquiry into Scientology, Australian Justice Brookings made a telling closing statement that continues to be a harbinger of the Scientology phenomena.

> *" ...it is nonetheless clear that the teaching of Scientology and the practice of Scientology will result in the commission of many offenses and may well result in the commission of many others...*

"The only thing necessary for evil to triumph is for good people to do nothing." (Author unknown.).

Clearwater Sun, January 24, 1984

PRIOR SECT TRY AT JUDGE REPORTED

By GEORGE-WAYNE SHELOR Sun staff writer

A current probe into a suspected 1982 extortion plot by the Church of Scientology to corrupt a Tampa federal judge might not be the first time law enforcement officials. have investigated the sect's efforts to compromise a U.S. magistrate presiding over a Scientology trial.

In an article titled "Scientology's War Against Judges." which appeared in the December 1980 issue of The American Lawyer, author James B. Stewart Jr. details the sect's efforts to complicate, delay and quash the trial of 11 Scientology defendants charged with spying, wiretapping and breaking into government offices.

The U.S. Attorney's Office in Tampa currently is investigating a purported plot involving an attempt to lure U.S. District Judge Ben Krentzman aboard a boat off the Pinellas Suncoast where prostitutes and drugs were to be used to put the judge in a compromising position.

At that time, Krentzman, chief judge of Florida's 32-county Middle District was presiding over the Tonja C. Burden vs. the Church of Scientology case in which Miss Burden was seeking $16 million from the sect, claiming mental abuse, brainwashing, imprisonment and fraud, according to public records. The trial is, to date, unresolved, and Judge Krentzman has retired.

Through several confidential sources, the Clearwater Sun has verified the current federal probe, **although as of Monday, U.S. Attorney Robert Merkle would neither confirm nor deny it.**

But four years ago in Washington, D.C., a U.S. District Court judge stepped down from a federal criminal conspiracy trial involving the controversial sect.

Stewart presently a staff writer with the Wall Street Journal, was for three years a practicing attorney and, at the time he wrote the article about the trial, a senior editor at The American Lawyer.

In his report, Stewart described the intensive campaign by Scientology attorneys to discredit and cause to resign from the case three judges over the duration of the trial.

The trial of the 11 defendants began Aug. 15, 1978. The group of Scientologists was indicted on a number of federal charges. including obstruction of justice. The first two judges assigned to the case--D.C. District Court Judge George Hart Jr. and Judge Louis Oberdorfer--stepped down during the course of the protracted proceedings, bowing to defense motions for dismissal.

Shortly after Feb. 5, 1979, when Oberdorfer stepped down, the case fell to Judge Charles Richey, a jurist with a respected national reputation. The Scientologists initially were pleased with Richey's appointment, saying as much in when the trial moved back and forth from Washington, D.C., to Los Angeles to accommodate witness's testimony -- they apparently became displeased with several of Richey's rulings, Stewart said, adding that at one point, attorneys for the sect filed a motion asking the judge to disqualify himself from the case. Richey dismissed the motion.

By June 1970, according to Stewart's report. defense council were ready with another dismissal motion, one which was damaging and threatening to Judge Richey. The groundwork for that motion, Stewart wrote, had been laid nearly a year before, shortly after the hearings in Los Angeles.

According to Stewart's published report:

During the summer of 1979. a Scientology lawyer paid a private detective named Richard Bast

$321,000 plus expense to investigate Judge Richey's security precautions. One of the detective's first steps was to infiltrate Richey's inner circle at the courthouse.

Several of Bast's employee's befriended Richey's court reporter and tape-recorded several conversations which were the basis of the most recent dismissal motion. Some Scientology lawyers, however, thought the strategy had "gone too far" and withdrew as counsel.

Although the motion noted a number of reasons defense lawyers believed Richey was prejudiced -- including Richey suspecting the sect was spreading rumors about him as part of a "plot" to discredit him -- it failed to detail the alleged rumors about the judge, citing "respect for the court as an institution."

Bast, the detective, had secured damning information about Richey's personal habits, and when it was not included as part of the motion, he gave it to political columnist Jack Anderson.

Bast showed to one of Anderson's reporters a video recording, during which the prostitute recalled "in titillating detail" her encounter with Judge Richey and his procurement of her services. Bast also provided a lie detector test indicating the prostitute was telling the truth, and a statement from a U.S. marshal who had guarded the judge claiming Richey said, "Let's go get a woman."

Also made available to Anderson's reporter was a tape recording of Richey's court reporter purportedly saying the judge "was always picking up girls."

After Anderson's syndicated column detailing Richey's alleged procurement of a prostitute was sent to newspapers July 11 (for July 18 publication) the court reporter denied the remarks attributed to him. The Sun was unable to contact the U.S. marshal involved.

On July 16, Richey issued his opinion on the case. Apparently referring to the upcoming column (which he knew about from reporters' calls), Richey called the dismissal motion "the latest effort in the escalating attack on the court" and said the motion was based on "hearsay, rumor and gossip."

Richey continued, admonishing the defendants and their counsel for their "groundless" attacks on his character, by saying that the proceedings had been turned "into a trial of this judge."

In a state of exhaustion and near-collapse, the 58-year-old judge withdrew from the case. On July 18, Anderson's column appeared in newspapers nationwide and five days later, Judge Richey was hospitalized for treatment of two pulmonary embolisms.

His ordeal may not be over, Stewart's report states. Scientology attorneys said the prostitute affair "is only the tip of the iceberg," and if necessary would expose additional damaging testimony.

Ultimately, all of the defendants, including Scientology founder L. Ron Hubbard's wife, Mary Sue, were convicted of the federal charges.

Stewart, contacted his New York office, said he developed his story from "court records ... and my own interviews.

"I spoke with the prosecutors (of the case) and I did a lot of legwork" on the story, which he says is completely factual.

Judge Richey has recovered and is still on the bench of the Washington, D.C., district. Contacted at his chambers, the judge declined to comment for the record on the allegations, the Jack Anderson column or the substance of the story.

Clearwater Sun Managing Editor Sam Fenton contributed to this report.

The American Lawyer, December 1980

SCIENTOLOGY'S WAR AGAINST JUDGES

BY JAMES B. STEWART, JR.

On September 5, 1980, as U.S. District Court Judge Charles Richey was recuperating from two pulmonary embolisms and exhaustion, lawyers for the Church of Scientology and the Justice Department gathered before Judge Aubrey Robinson, Richey's successor in the two-year-old conspiracy case against 11 members of the Church of Scientology. Judge Richey had already convicted and sentenced nine of the original 11 defendants, but the remaining two, recently extradited from England, were about to go on trial.

"Particularly from the standpoint of your Honor's feelings about these defendants who are members of the Church of Scientology..." began John Shorter, Jr., a lawyer for one of the defendants. He was interrupted by Judge Robinson. "You want to raise a motion to recuse?" the judge asked. He knew what Shorter's remark foreshadowed, having witnessed the Scientologists campaign to drive Judge Richey off the case. "Is this a fishing expedition?"

Robinson is the fourth D.C. district court judge to preside over the Scientology case and the latest target of the Scientologists' self-proclaimed "attack" litigation strategy. Their strategy amounts to an all-out war against the D.C. district court judges, a war much more sophisticated, better financed and more successful than the bizarre tactics used by some other groups against their courtroom adversaries, such as Synanon's attempt to murder an opposing counsel by putting a rattlesnake in his mailbox.

Unlike Synanon, the Church of Scientology has long sought to distinguish itself as a legitimate religion. Founded in 1954 by L. Ron Hubbard, a Science fiction writer, philosopher and author of the bestselling book *Dianetics: The Modern Science of Mental Health*, the church claims five million adherents to its selfhelp philosophy. The Church of Scientology has called itself the spiritual heir of Buddhism in the western world, and focuses on what it calls "pastoral counseling" to increase its members abilities and awareness.

But in the past few years, the church has been accused of brainwashing and harassing its members, and it has become em- broiled in dozens of lawsuits (see sidebar, page 32), including the 1978 criminal conspiracy charges against 11 of its members. Such setbacks have triggered increasingly militant responses, which focused, in the conspiracy case, on the federal judiciary. The Scientologists legal strategy has been to force the recusal of Judges lie at the root of the pending criminal charges against the Scientologists. In 1976. D.C. District Court Justice George Hart, Jr., casually proposed a deposition of Hubbard in conjunction with one of many Freedom Of Information Act suits filed by the church. Hart's remark (no deposition ever proved necessary) caused Scientology officials to believe that the government knew something incriminating about Hubbard. As a result the church intensified its efforts to learn what information the government might possess.

At the same time the church was issuing "Guardian Programme Orders" (directives to church members telling them to use "standard overt sources" and "any suitable guise interviews" to monitor the activities of all district court judges presiding in the FOIA suits. In 1977 that directive was extended to all 15 active judges in the D.C. federal district court.

Posing in some instances as students and journalists, Scientologists interviewed the judges, researched their careers and backgrounds, followed them and prepared dossiers. According to

Scientology documents, their goal was to determine "tone level" and "buttons on" --indicia of personal vulnerability, in the parlance of Scientology. But the church's operation went far beyond legal surveillance. Members of the church were caught breaking into the offices of the IRS and the Justice Department, stealing and copying documents and eavesdropping. On August 15, 1978, 11 Scientologists were indicted on charges of electronically intercepting oral IRS communications, forging government passes, illegally entering government buildings, recruiting Scientologists to infiltrate the government, stealing records belonging to the IRS, Justice Department and the U.S. Attorney and conspiring to illegally obtain documents in the possession of the United States and to obstruct justice.

The Scientologist defendants hired some well-known defense counsel. Mary Sue Hubbard, the wife of church leader L. Ron Hubbard and the highest ranking defendant on trial, retained Leonard Boudin of Rabinowitz, Boudin & Standard and Michael Hertzberg, a solo practitioner, both activist lawyers now practicing law in New York City. Two other defendants, Henning Heldt and Duke Snider, retained Alexandria, Virginia, lawyer Philip Hirschkop, who had been counsel for the "DC. Nine." antiwar protesters arrested in 1970. In all, 12 lawyers were hired to defend nine defendants (two others had fled to England where they faced extradition proceedings). Boudin and Hirschkop soon assumed the leading roles in the defense.

Boudin and Hirschkop won't discuss why they were selected, but their public identification with radical and unpopular causes was undoubtedly attractive to church members, This was Boudin's first association with the church, but Hirschkop had handled a search and seizure matter for the church in 1977.

One lawyer who represents Scientologists and has worked with Boudin and Hirschkop offers this ideological defense for their taking the case: "It is a simple case of government overreaching." he says. "The government just can't tolerate an organization with nonconforming beliefs. The Scientologists stand up for their rights -- aggressively." Another lawyer who has worked on the case adds a financial motive for their taking such a case: *"These people pay their bills -- top dollar and on time -which is more than I can say for most of my unpopular clients. This case will finance a lot of pro bono work."* Hirschkop won't say what he has received in legal fees from the Scientologists, but the church is a prosperous client In one instance a member paid the church $30,000 for the required series of counseling sessions.

Whatever their reasons for taking the case, high-minded principles have not characterized the campaign of the Scientologists' lawyers against the District of Columbia judges. In August 1978 the cases were assigned to Judge Hart,. the judge whose comment had originally intensified the intelligence operation and who, like all of his fellow D.C. district court judges, had been investigated. He became the first victim of the Scientologists' recusal strategy.

Boudin filed the first recusal motion in January 1979. His theory was a novel one: by telling Judge Hart that the judge himself was a target of the Scientologists' own possibly illegal activities, he would cause the judge to be biased, or appear to be biased, against them. In his motion, Boudin quoted a Scientology document ordering an "overt" and "covert" data collection operation against Judge Hart, which, in Boudin's words, "possibly [included] the use of methods violative of the judge's privacy and other rights and possibly violative of the criminal laws." Boudin concluded that "the sitting judge is revealed to the jury and the public as a victim of possibly illegal actions," and "the judge has an obvious interest which may be affected by the outcome of the case." Notwithstanding documents to which government and defense counsel had access ordering similar operations on all the District of (Columbia district court judges, Boudin declared that he knew of no other such campaigns.

Although government lawyers. led by chief prosecutor Raymond Banoun, protested vigorously, arguing that the Scientologists were using their own possibly illegal activities to disqualify the judge, Hart granted the recusal motion and stepped down. Hart denied that he was biased, but he agreed that the appearance of impartiality had been tainted by the Scientologists' surveillance operation against him. "I was afraid a jury would be prejudiced against the defendants because of their alleged threats against me." Hart said recently.

The case was assigned next to Judge Louis Oberdorfer, who in light of Judge Hart's recent experience asked for memoranda and oral arguments from both sides at the outset indicating potential grounds for disqualification. Government lawyers pointed out in their memo that Oberdorfer was formerly an assistant attorney general in charge of the tax division of the Justice Department, which had prosecuted a case that ended the tax-exempt status for the founding Church of Scientology in Los Angeles in 1969. Oberdorfer concluded that he had "personal knowledge of disputed evidentiary facts," and on February 5. 1979. he too stepped down.

Shortly afterward the case fell to Richey, 57, a 1971 Nixon appointee whose liberal record -- especially in the area of defendants rights -- surprised early critics. The assignment initially pleased the Scientology defendants. In a pamphlet called "The Trial of the Scientology Nine," prepared by the Scientologists, Judge Richey was described as having "a very fatherly visage . . though crippled with a congenital defect in his hip, one does not notice either his limp or his shortness. His glasses glinting from the lights of the courtroom add to the picture of a man of deep intelligence and sympathy." And when Richey, too, asked at the outset for a recusal motion if one were planned, Boudin and Hirschkop said they were satisfied with his assignment to the case. That attitude was soon belied by a campaign of harassment that took place in and out of the courtroom.

During the summer of 1979, court sessions were held for about three weeks in Los Angeles, where Richey scheduled testimony on the Scientologists' motion to suppress evidence seized by the FBI in its 1977 raids of the church's headquarters. The thousands of documents seized in those raids constituted the core of the evidence against the alleged conspirators. The hearings had been moved to Los Angeles to accommodate the Scientologists' witnesses.

Prior to his departure for Los Angeles, Richey received several death threats. The judge has never publicly alleged that those threats came from Scientologists and has said they were unrelated to the case, but he flew to California escorted by two federal marshals, and elaborate security precautions were implemented at the federal courthouse in downtown Los Angeles.

During the hearings, defense lawyers repeatedly interrupted the proceedings with objections, motions and audible commentary, including insults to the judge. For example, Hirschkop and other counsel repeatedly and loudly ordered co-counsel to place adverse evidentiary rulings in a mythical "error bad." On several occasions, Hirschkop accused Richey of lying. At times, Richey left the bench and walked out rather than hold defense counsel in contempt. Only once, at a later hearing, did the judge seem to boil over: speaking to Hirschkop, Richey said, "I want to tell you right here and now, I resent it because I have done nothing to hurt you or your clients. And this record is replete with insults and everything else, when I have not done it to you and don't intend to." Banoun, the prosecutor, says Richey was too accommodating. "He should never have tolerated such behavior, " Banoun says.

Hirschkop claims that he was the one who was insulted. "Richey showed contempt for me," Hirschkop says, recalling the time when, he claims, Richey tried to "force-feed" him French fries in court. (Banoun says the judge simply offered all the counsel some French fries he had not finished at lunch.) "I called Banoun a liar," Hirschkop continues, "and the judge admonished me. But Banoun could insult me with impunity." Banoun denies that this was true. Hirschkop concedes that he frequently became "heated" in his dealings with Judge Richey but says, "I never called him dirty names."

In September 1979, after the Los Angeles hearings, Richey denied the Scientologists' motion to suppress the evidence seized by the FBI. The defendants eventually entered into a stipulation of facts, which amounted to an admission of the principal charges against them, and waived a jury trial. In return, the government agreed to drop 23 of its 24 criminal counts.

Judge Richey explicitly warned the Scientologists that the stipulation was likely to result in their conviction: he subsequently conducted his own review of the evidence, which he said was "overwhelming evidence of guilt," and on October 26, he convicted all nine. On December 6, two days before they were to be sentenced, a recusal motion against Richey was filed.

In this recusal motion, Boudin and Hirschkop again took the extraordinary position that Richey's response to their courtroom tactics and to the threats showed that Richey was prejudiced against Scientologists. For example, without saying that the death threats were made by Scientologists, Hirschkop said that "upon information and belief, the security in Los Angeles was related to the court's apprehension with regard to the defendants in this case or their church," adding that "it is impossible to imagine a stronger --or more clearly 'extra-judicial' --source of bias than fear for one's life or wellbeing."

Whatever its merits, the recusal motion was patently defective in at least two technical respects. The judicial recusal statute requires a "timely" motion supported by an affidavit signed by a "party." This motion was filed four months after the events complained of-- and after nearly 120 defense motions had been resolved against the Scientologists --and was supported by Hirschkop's affidavit, not one of the defendants. ("I should have filed it much sooner," Hirschkop concedes. "Richey was grossly prejudiced from the start.") In response to the motion, Judge Richey defended his security precautions, noting that "the court may accept reasonable security precautions without risk of tainting its rulings in the case." He denied the motion and that same day sentenced the nine defendants to prison terms of from six months to four to five years. Eight pulled out checks for $10,000 the day of their sentencing, and all nine are now free on bail pending appeal.

The denial of their first recusal motion and the sentences, which the Scientologists regarded as unconscionably harsh, led to a redoubling of defense efforts to drive Richey from the case. Six months later, in June 1980, defense counsel were ready with another recusal motion, more damaging and threatening to Judge Richey than the first. The groundwork for that motion had been laid nearly a year before, shortly after the Los Angeles hearings.

That summer, Thomas Dourian, Judge Richey's official court reporter who accompanied him to Los Angeles, was approached by Hirschkop soon after their return to Washington. In a sworn affidavit filed in response to the second recusal motion, Dourian says Hirschkop wanted to know if the security precautions in Los Angeles resulted from Richey's fear of Scientologists. In the affidavit Dourian swore he denied that the judge was afraid but confirmed that before leaving Washington, the judge and his wife and two sons had received two death threats.

Soon after this encounter, in December 1979, a Scientology lawyer hired Richard Bast, a private detective who had worked for Hirschkop several years before, to investigate Judge Richey's security precautions. Bast's fee: $321,000 plus expenses. One of Bast's first steps was to infiltrate Richey's inner circle at the courthouse.

In the spring of 1980, a few months after the Scientologists' sentencing, Fred Cain, a Bast employee and retired police officer, approached James Perry, one of two U.S. marshals who had accompanied Richey to Los Angeles. Cain explained to Perry that he had been retained by a European industrialist whose daughter had committed suicide, allegedly as a result of her involvement with the Church of Scientology, and that his assignment was to uncover information that could be damaging to the church. According to Bast, Perry told Cain that he wanted to write a book on the Scientology case, and Bast offered him a $2,000 advance. Bast says that Perry took the money, and they agreed to work together.

The evening of May 23, Perry and Cain met Dourian, the court reporter, at his home in Washington. According to Dourian's affidavit, Cain introduced himself as a private investigator for International Investigations, Inc., Bast's detective agency, and told him the same story about the European industrialist.

Dourian says in his affidavit that he found the story improbable but that because his home had been burglarized and he had received threatening phone calls, which he suspected came from Scientologists, he was curious about what Cain and Perry were doing. According to the affidavit, Dourian met with Cain three more times, and each time he was questioned about Judge Richey. At a meeting at his home on May 31, 1980, Dourian says he realized that the conversation was being recorded. Cain had been drinking heavily, Dourian says, and as a result, the court reporter was able to slip a small tape recorder and three cassettes out of Cain's pocket. Dourian's last meeting with Cain was on June 19, when they met with Bast and then dined at a nearby Pizza Hut. Again, Dourian was asked about Richey, and the conversation was recorded.

The recordings of Dourian, along with tape-recorded statements made by Hirschkop -- all collected by Bast -- formed the basis for the next recusal motion against Judge Richey. The motion, largely incorporating an earlier recusal motion filed by Hirschkop, was filed on June 20, 1980, as proceedings were beginning against the two defendants recently extradited from Great Britain. For some of the Scientologists' counsel, however, the recusal strategy had gone too far. There was apparently opposition within the ranks to these motions and the way they were prepared. One lawyer, Michael Nussbaum, who represented two of the defendants, didn't sign the papers and withdrew as trial counsel.

The affidavit in support of this motion was filed by Morris Budlong, one of the extradited defendants, after he listened to various tapes and spoke to Hirschkop. Among the prejudicial remarks that Budlong attributed to Judge Richey were: that Richey's death threats emanated from Scientologists; that Jim Jones and Scientologists were "all the same"; that it would be a "feather in his hat" to convict the Scientologists; and that Richey had told another judge that Scientologists were spreading rumors about him as part of a "plot" to discredit him.

A cryptic footnote to the affidavit declined to provide details of the alleged rumors about Richey, citing "respect for the court as an institution." But Hirschkop and other defense counsel knew the details of the plot Richey alluded to. They had gotten them from Bast, who says he had combed the Los Angeles area for information about Judge Richey's personal habits, interviewing motel and restaurant employees and making videotapes and recordings. The information not revealed in the motion was taken by Bast to political columnist Jack Anderson.

The central figure in Bast's story was a self-professed Los Angeles prostitute who worked the Brentwood Holiday Inn, the motel where Richey stayed during the Los Angeles hearings. In a video recording shown to Gary Cohn, a reporter for Anderson, the prostitute recalled "in titillating detail," according to Cohn, an encounter with Judge Richey at the motel and his procurement of her services. According to Cohn, Bast also showed results of lie detector tests conducted by Cain to demonstrate that the prostitute was telling the truth; a tape recording of Perry, the U.S. marshal, claiming Judge Richey said, "Let's go get a woman"; and a tape recording of Dourian, the court reporter, saying Richey "was always picking up girls."

Cohn says that he was initially skeptical of the story because he was aware that Bast was employed by the Scientologists. But he says he had often worked with Bast and trusted him. He says he considered but rejected the possibility that the prostitute was herself a Scientologist, planted to entrap the Judge. Bast says only that his discovery of the prostitute was "accidental," that he paid her $1,200, that she is not a Scientologist and that she is no longer streetwalking.

Cohn wrote the column, which later appeared under Anderson's by-line, focusing on Bast's investigation and Richey's procurement of a prostitute. Cohn adds that he is now "not happy" with the way the column was written. In his affidavit, Dourian, the court reporter, who has heard the tapes he stole from Cain's pocket, denies the remarks attributed to him.

Newspapers that subscribe to Anderson's column received the Judge Richey story around July 11, a week before its release date of July 18. Some of them balked at running it -- the New York Daily News decided not to publish it -- and The Washington Post used it only after extensive conversations with Cohn. Cohn says he never reached Richey for comment, and although Post editor Ben Bradlee says he is sure "we did call (Richey) about the column," no comment from Richey appeared in the Post's version, either.

On July 16, Richey issued his opinion. Evidently referring to the upcoming Anderson column, which Richey might have known about from reporters' calls and messages, Richey characterized the recusal motion as "this latest effort in the escalating attack on the court" and found the grounds for the motion to be "insufficient as a matter of law," resting only on "hearsay, rumor and gossip."

But, the judge continued, "defendants and their counsel have engaged in groundless and relentless attacks on this court. Their motive is transparent. It is an attempt to transform the trial ... into a trial of this judge." Though he labeled the attempts to remove him a "classic example" of abuse of the recusal statutes, he wrote that "the time has come for the proceedings in this case to proceed on the merits with the attention of all directed at the real issues in this case." As a result, Richey withdrew from the case in a state of exhaustion and near-collapse, according to associates.

On July 18, Jack Anderson's column appeared in newspapers throughout the country. Five days later, Judge Richey was hospitalized with exhaustion and pulmonary embolisms. He has since declined all comment on the case, citing the code of judicial conduct.

Judge Richey's ordeal may not be over. Hirschkop vows that his campaign against the judge will continue, and he claims that the prostitute affair is "only the tip of the iceberg." Although Hirschkop declines to disclose details, he says if necessary he will expose additional damaging information uncovered by Bast.

Apart from the delays, the campaign against Judge Richey has had negligible legal impact on the proceedings against the Scientologist defendants. Though an appeal is pending on a conventional search and seizure question, the convictions of the first nine stand. Trials of the remaining two defendants started in late October under Judge Robinson and are still in progress.

The activities of the Scientologists and their counsel in this case seem destined only to satisfy a commandment L. Ron Hubbard once wrote:

"The DEFENSE of anything is UNTENABLE. The only way to defend anything is to ATTACK, and if you ever forget that, then you will lose every battle you are ever engaged in, whether it is in terms of personal conversation, public debate, or a court of law. NEVER BE INTERESTED IN CHARGES. DO, yourself, much MORE CHARGING, and you will WIN."

In its July 1980 issue the American Lawyer named Judge Charles Richey runner-up to the worst District of Columbia federal district court judge. The lawyer who most vehemently denounced Richey was one of the Scientologists' defense counsel, and this same lawyer also referred our reporter to other lawyers who have represented Church of Scientology defendants. The reporter, who has since left our staff, says he was unaware of Scientologists' efforts to discredit and recuse Judge Richey. Without the lawyer's vehemently derogatory remarks and his referrals to other "sources," our reporter says he would not have named Richey in the survey.

BATTLES ON OTHER FRONTS

The Church of Scientology has been involved in almost constant litigation since its founding nearly 30 years ago. Besides periodic clashes with the government, the church has filed scores of suits against the media to inhibit the news coverage of its activities.

Among the more recent cases involving the church and the media:

Fourteen libel suits have been filed against Paulette Cooper, New York freelance writer and author of the 1971 book, The Scandal of Scientology, and her publisher. Church documents seized in the 1977 Los Angeles raid and made public last year revealed "Operation Freakout," a campaign of harassment directed against cooper that included death threats, obscene phone calls, phony letters about her sexual behavior and a forged bomb threat against the church that resulted in Cooper's indictment in 1973. The charges against Cooper were dropped in 1975. Cooper has now retaliated with a $55-million suit against the church.

A 1977 suit against the San Diego Union asked $10,000 in damages for invasion of privacy from a reporter who had registered for a Scientology course in order to write a story about the church. The church offered to drop the suit if plans to publish the story were dropped, but after the story ran, the church increased its damage claim to $600,000 and added charges of fraud and deceit against the paper. The case was dismissed on summary judgment.

In 1976 the church sued the Clearwater Sun in Florida for $1 million and threatened to sue the St. Petersburg Times for a series of stories on the church. Scientologists spread rumors linking Times officials to the CIA, the FBI and the Communist Party, and harassed reporters. The Sun countersued the church for abuse of process, and the Times sued for an injunction barring the church's harassment of its reporters. The church subsequently dropped its suit against the Sun and never followed through on its threat to sue the Times.

In March 1979 the church sued two New York writers, Jim Siegelman and Flo Conway, after they criticized Scientology on the "David Susskind Show" while discussing their book, Snapping. After the Scientologists' suit against them was dismissed, the pair countersued, charging the church with malicious prosecution.

The church has lately found itself on the defensive in a flurry of suits filed against it by disgruntled former church members and recruits. Currently pending against the church are:

a suit filed October 21 by Lawrence Stifler, a Boston marathon runner, asking 41.25 million for damages sustained after he was allegedly physically attacked by a Scientology recruiter. Stifler says that due to the injury, he may never run again;

a $16-million suit filed in April by Tonja Burden, a 20-year-old former church member who claims she was deceived and forced to remain in the church, used as slave labor and kidnapped after she escaped;

a $21-million suit brought by jazz guitarist Gabor Szabo in February, accusing the church of embezzlement, kidnapping and forcing him to undergo a "life repair course";

a class action filed last December by former church staff member Lavenda Van Schack, seeking $200 million on behalf of church dropouts. Her suit accuses the church of mind control, unlawful electronic surveillance and leaking details of her private life to the media.

Last year, Julie Titchbourne, a former Church of Scientology member, was awarded 42 million by a Portland, Oregon, jury, which found that the church's promises of a better life were fraudulent. The church as subsequently sued four "deprogrammers" for $2 million collectively, claiming that they induced Titchbourne to turn against the church.

-- J.B.S.

Shudder into Silence

The Church of Scientology doesn't take kindly to negative coverage

By Robert W. Welkos
Reprinted from The Quill, Novemeber-December 1991, pp.36-38

In the late spring of 1990, shortly before the *Los Angeles Times* published a comprehensive series on the Church of Scientology by staff writer Joel Sappell and myself, a deliveryman arrived at my house and propped a large manila envelope against my front door. It was from a mortuary, and inside was a brochure extolling the benefits of arranging your funeral before you die.

"Investigate the pre-arrangement program at our memorial park now," the brochure read. "You'll be glad you did, and so will your family."

Curious, I telephoned the mortuary and asked why they had sent me the material. To my amazement, they didn't know they had and told me they never sent brochures unsolicited because it can be upsetting. They assured me they were always sensitive to such concerns and that it would not happen again.

But it did.

Two days later, my wife caught a glimpse of a man hurrying down the front walk. By the time she opened the door, he was driving away, but left on the step was another envelope from the same mortuary.

I would never know if the deliveries were just a mix-up or a sinister prank. Just as I have never known who made the dozens of hang-up telephone calls to my house; what caused my partner's dog to go into seizures on the day the Times published the secret teachings of Scientology; why a bogus assault complaint was filed with the Los Angeles Police Department against Sappell by a man whose address and name proved to be phony, or why car dealers we had never dealt with were making inquiries into our personal credit reports.

Yet, I wondered: Were these incidents more than coincidence?

WHENEVER JOURNALISTS ASK CRITICAL QUESTIONS ABOUT SCIENTOLOGY THEY CAN EXPECT TO ENDURE INTENSE PERSONAL SCRUTINY OVER THE YEARS. VARIOUS REPORTERS HAVE BEEN SUED, HARASSED, SPIED ON, AND EVEN BEEN SUBJECTED TO DIRTY TRICKS.

Our investigation of Scientology began in 1985. The undertaking stretched over five difficult years and tested the will of the newspaper as we were repeatedly subject to the church's intimidative tactics.

In the end, we published 24 stories over six days, exploring virtually every facet of Scientology, from its confidential doctrines to its abuses against former members to the fictional background of its founder, the late science fiction writer L. Ron Hubbard. The series also revealed how Scientologists had created numerous tax-exempt front groups and profit-making consulting firms to spread their beliefs throughout American society, and how Hubbard's remarkable string of 22 bestsellers was accomplished, in part, through multiple purchases of his books by Scientologists and employees of Hubbard's publishing house, which is controlled by church members.

The story took us across the U.S. and into Canada, interviewing hundreds of people, reviewing thousands of pages of documents, and studying the arcane writings of Hubbard himself.

Along the way we were sued once and successfully fought two federal court subpoenas served by Scientology to gain access to our research.

At various times, we were investigated by as many as three separate teams of private investigators hired by Scientology's attorneys. Up to the week of publication, the newspaper continued to receive letters from church lawyers threatening suits. I was sued by a church paralegal; for false imprisonment after he served me with a subpoena inside the newspaper and I told him to wait in an editor's office until security arrived and determined how he entered the building.

Outside the church's Golden Era Studios in Riverside, California, a *Times* photographer stopped his car on a public highway and began taking pictures of the compound when he was confronted by uniformed Scientology guards with walkie-talkies who demanded that he surrender his film. He refused after a long and tense confrontation, during which he was asked if he worked for the CIA. Later, at a church facility in Hollywood, the photographer parked on the street and began snapping pictures of two Scientologists assigned to Scientology's Rehabilitation Project Force, a kind of boot camp where members wear dark armbands, run everywhere, and perform menial tasks until their superiors determine that they have been properly rehabilitated. As the camera clicked, one of the men hurled a caustic substance at the photographer's car, eroding the paint.

On one occasion, people we had interviewed for the series were visited by private investigators posing as a film crew doing a documentary on Scientology.

In the weeks after the series appeared, Scientology struck back.

It purchased advertising space on more than 120 billboards and 1,000 bus placards around Los Angeles. The ads, which prominently included the newspaper's logo and our names, quoted from our series, but they had edited the excerpts to create the false impression that the *Los Angeles Times* was endorsing Scientology. It was so strange for me to be driving to work each morning on the freeway and then, in letters that looked 10 feet high, see my name plastered on a gigantic billboard, or standing at a crosswalk and glimpse my name whizzing past me on the side of a bus.

When *Time* magazine published a cover story about Scientology last May 6, Time Associate Editor Richard Behar wrote that "at least 10 attorneys and six private detectives were unleashed by Scientology and its followers in an effort to threaten, harass, and discredit me." Behar said that a copy of his personal credit report with detailed information about his bank accounts, home mortgage, credit-card payments, home address, and Social Security number had been illegally retrieved from a national credit bureau. Private investigators contacted his acquaintances and neighbors. He was subpoenaed by one attorney and he said another falsely *suggested that he* might own shares in a company he was reporting about.

A Miami private investigator, working for Scientology attorneys, posed as a woman whose niece was a Scientologist and sought advice on how to deal with her and the church.

"They have unleashed private eyes on most of the sources that were named in the story," Behar said in an interview.

On the public front, Scientology reportedly spent over $3 million to run daily ads in *USA*

Today. One ad blasted *Time* by claiming the magazine had once supported Adolph Hitler and his Nazi regime. The church also mailed out thousands of copies of an 80-page booklet entitled "Fact vs. Fiction," in which it attempted to correct "falsehoods" in Behar's article. Such attempts are known as "dead agenting" in Scientology.

Behar's experience was not unique.

When Linda Stasi of *New York Newsday* wrote a sharp-tongued gossip column about Scientology and mentioned Time's upcoming cover story, she received a letter from a man identifying himself as a U.S. Customs Service agent at Kennedy Airport. "He said my name and both of my reporters [Dough Vaughan and Anthony Scaduto] were going on their computer and he would personally see we underwent full body searches and rectal examinations until they found drugs or contraband on us the next time we went through customs," Stasi recalled.

Alarmed, the newspaper's executives referred the matter to the Customs Service for investigation. Not long afterward, executives said, an FBI agent contacted them and said an individual whom he did not name had complained that *Newsday* was having him harassed and wanted the agency to investigate the newspaper. As of this writing, the outcome of both probes is not known.

Stephen Koff, a staff writer at the Sr. *Petersburg Times*, said that after he began investigating Hubbard's church in 1988, a car dealership in California checked out his personal credit report, as did a sculptor, who has since died. "My guess it was really a private investigator [who checked out his credit]," Koff said.

While in Los Angeles to report on the church, Koff said, his wife began receiving obscene phone calls late at night and people claiming to work for credit card companies called wanting to know personal information about him. A week after his series appeared, he noticed a private investigator parked outside his house. At one point, he peeked through the blinds and the car was gone.

"Almost two hours later, I'm leaving with my daughter to take her to the baby sitter and I see the same car parked on a different street but parked in such a way they could see my house." As he drove off and got on a freeway the same car appeared in front of him. Koff said he learned through police sources that the car had been rented by a private investigator.

When Robert W. Lobsinger, publisher of the *Newkirk Herald Journal* in Newkirk, Oklahoma, began writing biting editorials alerting residents that Scientologists were quietly building a huge drug rehabilitation center on a nearby Indian reservation, he also was visited by private investigators on behalf of Scientology.

One "went to the sheriff's office poking around wanting all the terrible bad criminal history on me, my wife, and kids." Lobsinger recalled. "Of course, there isn't any. He wandered around town talking to everybody else trying to get the goods or me. They sent him down with a full-page ad to run in my paper and a handful of hundred dollar bills to buy this ad. Of course' the ad was a condemnation of me for exposing Scientology and insinuating that I was obviously a drug dealer and was a terrible bad guy . . . So they took it to the daily paper 15 miles north of us and they ran it up there." Lobsinger said Scientologists then mailed the ad to Newkirk's 2,500 residents.

No matter where Scientology surfaces as a story, journalists can expect to be targets of a "noisy" investigation.

"Remember," Hubbard wrote as far back as 1959, "intelligence we get with a whisper. Investigation we do with a yell." In "The Manual of Justice," Hubbard gave point-by-point instructions on how to deal with a "bad magazine article." First, he wrote, "Tell them by letter to retract at once in the next issue." The second step, he said, is to "hire a private detective of a national-type firm to investigate the writer, not the magazine, and get any criminal or Communist background the man has." The third step is to have lawyers write the magazine threatening suit, and then use the information gleaned from the investigator to make the writer "shudder into silence."

Using lawyers to attack its critics is standard Scientology procedure. Among the millions of words Hubbard left to his followers were precise directives on how to deal with critics and the press:

"The purpose of the [lawsuit] is to harass and discourage rather than win."

"If attacked on some vulnerable point by anyone or anything or any organization, always find or manufacture enough threat against them to cause them to sue for peace . . . Don't ever defend. Always attack."

"We do not want Scientology to be reported in the press, anywhere else than on the religious pages of newspapers... Therefore, we should be very alert to sue for slander at the slightest chance so as to discourage the public presses from mentioning Scientology."

"NEVER agree to an investigation of Scientology. Only agree to an investigation of the attacker . . . Start feeding lurid, blood, sex crime, actual evidence on the attack to the press. Don't ever tamely submit to an investigation of us. Make it rough, rough on attackers all the way."

When British author Russell Miller wrote a critical biography of Hubbard in 1988, an anonymous caller to police implicated Miller in the unsolved ax slaying of a South London private eye. Miller was interrogated by Scotland Yard, which later admitted the investigation was a waste of time that had "caused Mr. Miller some embarrassment."

The Sunday Times of London interviewed a private detective in 1987 who said he had been paid $2,500 by the Church of Scientology for attempting to smear Miller. The private eye was quoted as saying that he thought Miller was "at risk" and added: "People acting for the church are willing to pay large sums for men to discredit him. These bastards will stop at nothing."

When the St. *Petersburg Times* planned a review of another biography that was critical of Hubbard, it received a letter from a Scientology attorney threatening to sue the newspaper.

"We have evidence that your paper has a deep-seated bias against the Church and that you intend to hit the Church hard with this review," the letter from Los Angeles attorney Timothy Bowles stated...."If you forward one of his lies you will find yourself in court facing not only libel and slander charges, but also charges for conspiracy to violate civil rights. If you publish anything at all on it, you may still find yourself defending charges in court in light of what we know about your intentions. We know a whole lot more about your institution and motives than you think."

The newspaper published its review and Bowle's letter.

But the biggest horror story belongs to New York author Paulette Cooper.

Cooper, who wrote a scathing 1972 book entitled *The Scandal of Scientology*, was indicted on charges of making bomb threats against the church. The charges were eventually dismissed after authorities discovered the church had obtained stationery she had touched and used it to forge the bomb threats.

Today, when journalists launch investigations of Scientology, they can expect to be contacted by the Office of Special Affairs, the church unit responsible for countering outside threats. Attorneys at *OSA coordinate the activities of private detectives who gather information and spy on church critics.*

Journalists should know that even before they begin conducting interviews with church officials, those officials are prepared for them. Scientologists who regularly deal with the media are drilled in how to handle questions. The church once issued a bulletin on how to "cave in" a reporter by "shouting, banging, pointing [and] swearing."

Scientologists also were instructed how to be "covertly hostile" to a reporter: "He uses the word as a rapier and plunges it at the reporter, so that the reporter introverts and drops the questions."

Preparing for a hostile interview is one thing. Wondering whether you've been targeted for harassment is another.

Several weeks before the publication of our series, I joined a number of other Times' reporters for a drink and conversation at a nearby watering hole. As we sat laughing and talking, I noticed a woman sitting alone, facing me at a nearby table. Each time I looked in her direction she glanced at her wristwatch, as if to indicate she was waiting for a friend who never arrived. She waited for well over an hour until I mentioned to another reporter how odd it was.

As I headed home on the freeway I noticed a California Highway Patrol car swerving back and forth across the lanes, slowing traffic to a crawl. He slipped in behind my car, and ordered me to pull over. I asked the officer what I had done, and then saw there were three more patrol cars lined up behind me, all with their lights flashing.

After I was given a sobriety test, the officers huddled, then told me to gel going because I was sober. When I asked why I had been stopped, one officer said they had received a report that I was weaving and endangering other motorists.

The next day, I learned that the CHP had received a call over a car phone from a man identifying himself as a former Los Angeles police officer. He said he was following me and would direct the officers to my location.

Oddly, he never gave his name.

My colleagues later said I was lucky I hadn't made any sudden moves while getting out of my car. In a city plagued by freeway shootings and gangs, cops get nervous.

Welkos is a staff writer for the Los Angeles Times

SWORN STATEMENT

I Malcolm Claude Nothling, the undersigned, hereby state the following under oath:

1 I am a Caucasian male 38 years of age, born on 31/08/54.

2 I was a dedicated member of The Church of Scientology from 1979 - 1986.

3 I served in the Special Forces in the South African Defence Force. During this period I became highly skilled in handling firearms. This information was known by senior members of the Church of Scientology in South Africa.

4 In May 1986 I was requested to take up an administrative position at the Church of Scientology's headquarters in Los Angeles.

5 I arrived in Los Angeles on 6th June 1986 expecting to take up an administrative post that urgently needed to be filled. A week after arriving I was seconded to assist with demonstrations outside the Los Angeles Supreme Court in which the case between Lawrence Wollersheim and the Church of Scientology was being heard.

6 I was also promised by the Church of Scientology, on arrival in Los Angeles, that they would attend to some of my previous counselling that had gone horribly wrong. I was experiencing suicidal feelings and feelings of anger and destruction. It required a tremendous effort on my behalf to restrain myself. I had previously submitted a report to the Religious Technology Centre of my condition.

7 During June/July 1986 I was approached by two Scientologists from the San Francisco area, specifically Concorde. Unfortunately I cannot recall their names but one of them had a signwriting business in that area. They proposed that I should assasinate Larry Wollersheim. They would organise the weapon and whatever else I needed to accomplish this task. I cannot say with any accuracy wether or not they had been instructed to organise this from a higher level within the organisation. However, I now find it disturbing that Scientologists, myself included at the time, can consider this method of resolving what they consider to be a problem. In fact I blame the policy within the Church of Scientology known as the 'Simon Bolivar'which encourages these acts against supposed enemies. At the time I seriously considered committing this crime but believed that I was going to be used as the "fall guy" because it would have been easy thereafter to show that I was demonstrating and stating that I found myself in an unstable condition. When I declined I fell out of favour with the Church of Scientology and was expelled without a hearing and on trumped up charges for which I am currently suing the Church of

Scientology.

8 The above is true and I am willing to submit to a polygraph test or any other method to establish the integrity of my statement.

...was sworn ... was placed thereon in my presence.

Edenvale on ... 14 ...

10 - 1st Ave

Edenvale

RANG
RANK

SA POLISIE
SA POLICE

SOUTH AFRICAN POLICE

1992-11-20

SUID-AFRIKAANSE POLISIE

SIEZED IN FBI SEARCH OF SCIEBTOLOGY HEADQUARTERS

INTELLIGENCE SPECIALIST TRAINING ROUTINE - TR L

Purpose: To train the student to give a false statement with good TR-1. To train the student to outflow false data effectively.

Position: Same as TR-1

Commands: Part 1 "Tell me a lie". Command given by coach. Part 2 interview type 2 WC by coach.

Training Stress: In Part 1 coach gives command, student originates a falsehood Coach flunks for out TR 1 or TR 0. In Part 2 coach asks questions of the student on his background or a subject. Student gives untrue data of a plausib sort that the student backs up with further explanatory data upon the coach further questions. The coach flunks for out TR 0 and TR 1, and for student fumbling on question answers. The student should be coached on a gradient until he/she can lie facily.

Short example:

Coach: Where do you come from?

Student: I come from the Housewives Committee on Drug Abuse.

Coach: But you said earlier that you were single.

Student: Well, actually I was married but am divorced. I have 2 kids in the suburbs where I am a housewife, in fact I'm a member of the P.T.A.

Coach: What town is it that you live in?

Student: West Brighton

Coach: But there is no public school in West Brighton.

Student: I know. I send my children to school in Brighton, and that's where I'm a P.T.A. member.

Coach: Oh, and who is the Chairman there?

etc.

PROOF OF SERVICE

I am employed in the county of Marin, State of California. I am over the age of eighteen years and not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California 94960. I served the foregoing document(s) described as:

DECLARATION OF LAWRENCE WOLLERSHEIM IN OPPOSITION TO SCIENTOLOGY'S MOTIONS FOR SUMMARY ADJUDICATION OF THE 20TH; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT

on the following persons on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

Laurie J. Bartilson, Esquire — MAIL
BOWLES & MOXON
6255 Sunset Boulevard, Suite 2000
Los Angeles, CA 90028

Michael L. Walton, Esquire — MAIL
P.O. Box 751
San Anselmo, CA 94979

[X]	(By Mail)	I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.
[ ]	(Personal)	I caused said papers to be personally served on the office of counsel.
[X]	(State)	I declare under the penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: April 10, 1995

FILED
APR 14 1995
HOWARD HANSON
MARIN COUNTY CLERK
Dept

Andrew H. Wilson, SBN 063209
WILSON, RYAN & CAMPILONGO
115 Sansome Street
Fourth Floor
San Francisco, California 94104
(415) 391-3900
Telefax: (415) 954-0938

Laurie J. Bartilson, SBN 139220
MOXON & BARTILSON
6255 Sunset Boulevard, Suite 2000
Hollywood, CA 90028
(213) 960-1936
Telefax: (213) 953-3351

Attorneys for Plaintiff
CHURCH OF SCIENTOLOGY
INTERNATIONAL

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

BY FAX

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; DOES 1 through 25, inclusive,

Defendants.

CASE NO. BC 157680

DECLARATION OF LAURIE J. BARTILSON IN SUPPORT OF PLAINTIFF'S REPLY TO ARMSTRONG'S OPPOSITION TO PLAINTIFF'S MOTION FOR SUMMARY ADJUDICATION OF THE TWENTIETH CAUSE OF ACTION OF PLAINTIFF'S COMPLAINT AND MOTION FOR SUMMARY ADJUDICATION OF THE THIRTEENTH, SIXTEENTH, SEVENTEENTH AND NINETEENTH CAUSES OF ACTION OF PLAINTIFF'S COMPLAINT

DATE: April 21, 1995
TIME: 9:00 a.m.
DEPT: 1

TRIAL DATE: May 18, 1995

I, Laurie J. Bartilson, hereby declare:

1. My name is Laurie Bartilson. I am a member of the law firm of Moxon & Bartilson, representing plaintiff in this action. I have personal knowledge of the facts set forth in this declaration and could competently testify thereto if called as a witness.

1. On April 7, 1995, the date on which his oppositions were due to be filed and served, Armstrong brought an _ex parte_ application to this Court for a continuance. He sought an additional week in which to file his papers.

2. On behalf of the plaintiff, I opposed Armstrong's application, both orally and in writing. I argued that Armstrong had already delayed hearing on the motions by 3 weeks, pushing the hearing to within 30 days of the trial date, and that Armstrong had already managed to secure 636 days of delay in this breach of contract case.

3. After hearing, this Court denied Armstrong's application, stating that no good cause existed for the requested continuance.

4. On April 11, 1995, I received a telephone call from the Court's research attorney. While sorting out the dates on which the motions were to be heard, the research attorney informed me that Armstrong had filed a declaration in opposition to one of the motions on Monday, April 10, 1995. I had not received anything from Armstrong. Accordingly, I immediately called Armstrong, got his answering machine, and left a message demanding that he send me anything that he had filed with the court immediately.

5. On April 12, 1995, Armstrong telefaxed me a letter stating that he had mailed a declaration and exhibits to her on April 10, 1995, and that he had filed no other documents "thus far." A true and correct copy of Armstrong's letter is attached hereto as Exhibit C. I have received nothing from Armstrong beyond the single, late-filed declaration.

6. In January, 1995, this Court heard another motion for summary adjudication in this action. Armstrong filed a supplemental declaration in opposition to that motion, late and without leave of court. The declaration was stricken, and Armstrong ordered to pay $700 as a sanction for the late filing.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 13th day of April, 1995, at Los Angeles California.

Laurie J. Bartilson

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevard, Suite 2000, Los Angeles, CA 90028.

On April 14, 1995, I served the foregoing document described as DECLARATION OF LAURIE J. BARTILSON IN SUPPORT OF PLAINTIFF'S REPLY TO ARMSTRONG'S OPPOSITION TO PLAINTIFF'S MOTION FOR SUMMARY ADJUDICATION OF THE TWENTIETH CAUSE OF ACTION OF PLAINTIFF'S COMPLAINT AND MOTION FOR SUMMARY ADJUDICATION OF THE THIRTEENTH, SIXTEENTH, SEVENTEENTH AND NINETEENTH CAUSES OF ACTION OF PLAINTIFF'S COMPLAINT on interested parties in this action,

[ ] by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

[X] by placing [ ] the original [X] true copies thereof in sealed envelopes addressed as follows:

MICHAEL WALTON
700 Larkspur Landing Circle
Suite 120
Larkspur, CA 94939

William R. Benz, Esq.
900 Larkspur Landing Circle, No. 185
Larkspur, CA 94939

[x] BY MAIL

[ ] *I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

[x] As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los

Angeles, California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

Executed on April 14, 1995 at Los Angeles, California.

[ ] **(BY PERSONAL SERVICE) I delivered such envelopes by hand to the offices of the addressees.

Executed on ____________ at Los Angeles, California.

[X] (State) I declare under penalty of the laws of the State of California that the above is true and correct.

[ ] (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Print or Type Name	Signature

* (By Mail, signature must be of person depositing envelope in mail slot, box or bag)

** (For personal service signature must be that of messenger)

Andrew H. Wilson, SBN 063209
WILSON, RYAN & CAMPILONGO
115 Sansome Street
Fourth Floor
San Francisco, California 94104
(415) 391-3900
Telefax: (415) 954-0938

Laurie J. Bartilson, SBN 139220
MOXON & BARTILSON
6255 Sunset Boulevard, Suite 2000
Hollywood, CA 90028
(213) 960-1936
Telefax: (213) 953-3351

Attorneys for Plaintiff
CHURCH OF SCIENTOLOGY
INTERNATIONAL

FILED
APR 14 1995
HOWARD HANSON
MARIN COUNTY CLERK
Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

BY FAX

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; DOES 1 through 25, inclusive,

Defendants.

CASE NO. BC 157680

PLAINTIFF'S COMBINED REPLY IN SUPPORT OF MOTION FOR SUMMARY ADJUDICATION OF THE TWENTIETH CAUSE OF ACTION OF PLAINTIFF'S COMPLAINT AND MOTION FOR SUMMARY ADJUDICATION OF THE THIRTEENTH, SIXTEENTH, SEVENTEENTH AND NINETEENTH CAUSES OF ACTION OF PLAINTIFF'S COMPLAINT

DATE: April 21, 1995
TIME: 9:00 a.m.
DEPT: 1

TRIAL DATE: May 18, 1995

RUSH

I.

INTRODUCTION

Plaintiff Church of Scientology International's two motions for summary adjudication seek an award of liquidated damages in the amount of $200,000, and the entry of a permanent injunction against defendant Gerald Armstrong. The motions are well-supported, virtually unopposed, and should be granted. The declaration of Lawrence Wollersheim, filed by Armstrong on April 10, 1995 without this Court's permission, should be stricken.

II.

THE OPPOSING DECLARATION FILED BY ARMSTRONG SHOULD NOT BE CONSIDERED AT ALL

A. The Declaration Was Not Timely Filed Or Served

The rules concerning oppositions to summary adjudication motions are very clear. A party opposing such a motion before this Court is required to file and serve "[a]ny opposition to the motion. . . not less than 14 days preceding the noticed or continued date of hearing, unless the court for good cause orders otherwise." Code of Civil Procedure Section 437c(b). Defendant Armstrong was fully aware of this statute. On April 7, 1995, the date on which his oppositions were due to be filed and served, he brought an ex parte application to this Court for a continuance. [Declaration of Laurie J. Bartilson] Plaintiff opposed the application, arguing, inter alia, that Armstrong had already delayed hearing on the motions by 3 weeks, pushing the hearing to within 30 days of the trial date. This Court denied Armstrong's application, stating that no good cause existed for the requested continuance. [Id., ¶ 3]

Armstrong filed and served nothing on April 7, 1995. On April 11, 1995, plaintiff's counsel received a telephone call from the Court's research attorney. While sorting out the dates on which the motions were to be heard, the research attorney informed Ms. Bartilson that Armstrong had filed a declaration in opposition to one of the motions on Monday, April 10, 1995. [Id., ¶ 4] On April 12, 1995, Armstrong telefaxed Ms. Bartilson a letter stating that he had mailed a declaration and exhibits to her on April 10, 1995, and that he had filed no other documents "thus far." [Id.] Plaintiff's counsel has received nothing from Armstrong beyond the single, late-filed declaration. [Id.][1]

Armstrong thus filed and served his single opposing declaration three days late, in violation of both the Code of Civil Procedure and this Court's clear order. The declaration should be stricken, and Armstrong sanctioned.

B. The Opposition Is Not Complete

Marin Court Rule 3.13(M) provides that:

> **Documents in Support of Opposition to Motion for Summary Judgment/Adjudication.** The opposition to a motion for summary judgment **must** consist of the following documents titled as shown:
>
> 1. [Opposing Party's] Memorandum of Points and Authorities in Opposition to [Moving Party's] Motion for Summary Judgment.
>
> 2. [Opposing Party's] Separate Statement of Undisputed Material Facts in Opposition to [Moving Party's] Motion for Summary Judgment.

---

[1] This is not the first time that Armstrong has improperly, and without permission, late-filed papers opposing plaintiff's motions. The first time it occurred, this Court accepted the papers and fined Armstrong $49. The last time it occurred, in January, 1995, this Court ordered the papers stricken, and sanctioned Armstrong and his counsel $700. [Bartilson Dec., ¶ 6]

> 3. [Opposing Party's] Evidence in Support of Opposition to [Moving Party's] Motion for Summary Judgment.
>
> 4. [Opposing Party's] Request for Judicial Notice in Opposition to [Moving Party's] Motion for Summary Judgment (if appropriate).
>
> 5. Proposed Order Denying Motion for Summary Judgment.

[Emphasis added]

Armstrong has filed none of these required documents. In essence he has asked the Court to determine how, if at all, his late-filed declaration of Lawrence Wollersheim negates some element of plaintiff's claims, or creates an issue of material fact as to any of the facts which plaintiff must prove to prevail. The Court should decline to perform this function, and strike Armstrong's late-filed, incomplete opposition.[2]

C. The Declaration Is Not Admissible Evidence

Wollersheim's declaration and its attachments consist almost exclusively of unauthenticated hearsay coupled with Wollersheim's opinions. That Wollersheim shares Armstrong's dislike for his former faith is manifest, but irrelevant to any of the issues presented by the summary adjudication motions. For detailed objections to this improper declaration, see the Church's separately filed Objections to Evidence Filed In Opposition to Motions for Summary Adjudication and Motion to Strike.

---

[2] Armstrong's status as a pro per litigant should not excuse him from complying with these rules. For three years in this litigation he not only had a lawyer, but worked with that lawyer as a paralegal on his own case. His knowledge of, and familiarity with, the Code of Civil Procedure and the Rules of this Court are manifest in the three motions which he brought to continue the hearings on these summary adjudication motions.

III

EVEN IF THE COURT CONSIDERS THE DECLARATION FILED BY ARMSTRONG, THE DECLARATION DOES NOT CREATE ANY ISSUE OF FACT WHICH WOULD REFUTE PLAINTIFF'S CLEAR CASE FOR SUMMARY ADJUDICATION OF FIVE CAUSES OF ACTION

In the moving papers, the Church set forth the elements which it must demonstrate in order to prevail on its breach of contract claims as a matter of law, and the evidence which demonstrated that the facts as to these elements are undisputed. The undisputed evidence, consisting almost exclusively of Armstrong's own admissions, demonstrates the existence of the contract, the terms of the contract, consideration paid by the Church, Armstrong's repeated, admitted breaches, and Armstrong's intention to continue to breach the contract at every opportunity, "no matter what a court says." Nothing in the sole declaration proffered by Armstrong refutes any of these facts.

A permanent injunction may be granted to prevent breach of contract "[w]here pecuniary compensation would not afford adequate relief" or "[w]here the restraint is necessary to prevent a multiplicity of judicial proceedings." Civil Code § 3422(1), (3). The scope and extent of the injunction are based on the need demonstrated by the moving party, and are committed to the sound discretion of the Court.

By his silence, Armstrong has conceded that a permanent injunction is mandated. The declaration offered by Armstrong appears to address, solely, the scope of that injunction. The import of Wollersheim's poisonous ramblings[3] appears to be that he wishes the Court would not restrain FACTNet, the corporation which he shares with Armstrong, as plaintiff has requested. Wollersheim, however, has provided no evidence of any facts which would support an injunction lessened in scope from that which the Church has delineated in its proposed order. Instead, Wollersheim's declaration and attachments provide a graphic example of the scope of the harm which Armstrong has been able to inflict on plaintiff by using FACTNet as an anti-Scientology soapbox. As Wollersheim himself proclaims, FACTNet has "assisted [Armstrong] with . . . telling the world the story of the abuse (sic) of Gerry Armstrong." Wollersheim Dec., ¶ 8.[4]

---

[3] The apparent intent of the declaration is to convince the Court that Armstrong is not the only person who thinks that the (continued...)

---

[3] (...continued)
Church is "bad," and that, because Wollersheim also thinks the Church is "bad," Armstrong should not have to keep his agreement with the Church. As Wollersheim himself states in his declaration, he has had no contact with the Church, except as an adverse litigant, for fifteen years. Wollersheim has no personal knowledge concerning most of the allegations he makes in his declaration and its attachments; what he has is a litigant's arsenal of false and misleading commentary, provided to him in no small part by Gerald Armstrong. The Church could, obviously, devote time, energy, and a couple of trees to demonstrating that Wollersheim's "evidence" consists of the false ravings of a money-hungry lunatic. The Church will not so destroy the Court's time. Wollersheim's opinion that the plaintiff is "bad" is irrelevant to these proceedings. Indeed, perhaps the only relevant communication contained in Wollersheim's declaration is his admission that FACTNet needs and uses almost exclusively materials provided by Armstrong in order to perpetrate its anti-Scientology campaign and foment litigation against plaintiff and other Churches of Scientology. [Wollersheim Dec., ¶ 10]

[4] Indeed, Armstrong's use of FACTNet to "tell the world" about his claimed Scientology knowledge and experiences continues unabated. The documents which Wollersheim attaches to his declaration as part of FACTNet's anti-Scientology "library" are rife with material concerning Armstrong. Recently, Armstrong chose to breach the Agreement yet again by forwarding a lengthy document to FACTNet Treasurer, Bob Penney, who promptly, at Armstrong's request, published the document to thousands of people on the Internet. If no permanent injunction issues, this breach will of necessity become part of still another legal action against Armstrong.

The declaration does not address, at all, any of the issues presented in the Church's motion for summary adjudication of breaches of the thirteenth, sixteenth, seventeenth and nineteenth causes of action. In their moving papers, the Church provided undisputed evidence that Armstrong had breached the Agreement by (1) Giving a videotaped interview concerning his claimed Scientology knowledge and experiences to Sylvia "Spanky" Taylor, at a convention of the Cult Awareness Network in November, 1992; (2) Giving interviews, and sending information, to Newsweek reporter Charles Fleming, concerning his claimed Scientology knowledge and experiences in June and August, 1993; (3) Giving an interview to E! TV reporters concerning his claimed Scientology knowledge and experiences in August, 1993; and (4) Providing declarations concerning his claimed Scientology knowledge and experiences to Graham Berry, attorney for Uwe Geertz, in the case of Church of Scientology International v. Steven Fishman et al., United States District Court for the Central District of California, Case No. 91-6426 HLH (Tx) (the "Fishman case") in February and April, 1994. Each of these breaches warrants imposition of liquidated damages in the amount of $50,000, for an aggregate award of $200,000.

IV.

CONCLUSION

The Church has suffered substantial and irreparable harm due to Armstrong's deliberate and systematic violations of the Agreement by "telling the world" what he thinks about Scientology, and the Church will continue to suffer substantial and irreparable harm absent issuance of a permanent injunction.

The facts of the making of the Agreement, performance by the Church, Armstrong's repeated breaches, and Armstrong's dedication to continuing to breach the Agreement are undisputed. A limited preliminary injunction has already issued, but it has not prevented him from continuous additional breaches. The evidence of Armstrong "avoiding" that limited injunction, and continuing to breach the Agreement, is overwhelming. Liquidated damages are available for some of these breaches, and should be awarded. However, issuance of a permanent injunction is also necessary for plaintiff to obtain meaningful relief.

Plaintiff respectfully requests that this Court enter the proposed permanent injunction, and adjudicate the thirteenth, sixteenth, seventeenth and nineteenth causes of action in plaintiff's favor.

Dated: April 14, 1995

Respectfully submitted,

Andrew H. Wilson
WILSON, RYAN AND CAMPILONGO

MOXON & BARTILSON

By: Laurie J. Bartilson
Laurie J. Bartilson

Attorneys for Plaintiff
CHURCH OF SCIENTOLOGY
INTERNATIONAL

H:\ARMSTRON\SJINJUN.REP

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I am employed in the County of California, State of California. I am over the age of eighteen (18) years and not a party to the within action. My business address is 6255 Sunset Boulevar, Suite 2000, Hollywood, CA 90028.

On April 14, 1995,I served the foregoing document described as PLAINTIFF'S COMBINED REPLY IN SUPPORT OF MOTION FOR SUMMARY ADJUDICATION OF THE TWENTIETH CAUSE OF ACTION OF PLAINTIFF'S COMPLAINT AND MOTION FOR SUMMARY ADJUDICATION OF THE THIRTEENTH, SIXTEENTH, SEVENTEENTH AND NINETEENTH CAUSES OF ACTION OF PLAINTIFF'S COMPLAINT on interested parties in this action,

[ ] by placing the true copies thereof in sealed envelopes as stated on the attached mailing list;

[X] by placing [ ] the original [X] true copies thereof in sealed envelopes addressed as follows:

GERALD ARMSTRONG
715 Sir Francis Drake Blvd.
San Anselmo, CA 94960-1949

MICHAEL WALTON
700 Larkspur Landing Circle
Suite 120
Larkspur, CA 94939

[X] BY MAIL

[ ] *I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

[X] As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing an affidavit.

Executed on ____________ at ______________, California.

[ ] **(BY PERSONAL SERVICE) I delivered such envelopes by hand to the offices of the addressees.

Executed on April 14, 1995, at Los Angeles, California.

[X] (State) I declare under penalty of the laws of the State of California that the above is true and correct.

[ ] (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

Print or Type Name

Signature

* (By Mail, signature must be of person depositing envelope in mail slot, box or bag)

** (For personal service signature must be that of messenger)

ORIGINAL

FILED 5850

APR 19 1995

HOWARD HANSON
MARIN COUNTY CLERK
By ________ Deputy

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450
In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive,

Defendants.

No. **157 680**

GERALD ARMSTRONG'S NOTICE OF FILING CHAPTER 7 BANKRUPTCY PETITION AND IMPOSITION OF AUTOMATIC STAY

TO THE SUPERIOR COURT OF CALIFORNIA, COUNTY OF MARIN, AND ALL PARTIES AND ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE that on April 19, 1995, Gerald Armstrong, defendant herein, in propria persona, filed a petition for Bankruptcy under Chapter 7 of the United States Bankruptcy Code, in the U.S. Bankruptcy Court for the Northern District of California, and an automatic stay was ordered as to all proceedings against said debtor. It is unlawful for any person, without the permission of said Bankruptcy Court, to take any actions against the debtor's property. A copy of the face page of said petition, No. 95 10911, is appended hereto.

DATED: April 19, 1995

By: ________________
Gerald Armstrong

cc MG

4/21

FORM B1 (6/90) Specialty Software, Royal Oak, MI

5851

FORM 1. VOLUNTARY PETITION

United States Bankruptcy Court
NORTHERN District of CALIFORNIA

VOLUNTARY PETITION

IN RE (Name of debtor - if individual, enter Last, First, Middle)
Armstrong, Gerald

NAME OF JOINT DEBTOR (Spouse)(Last, First, Middle)

ALL OTHER NAMES used by the debtor in the last six years
NONE

ALL OTHER NAMES used by the joint debtor in the last six years

SOC. SEC./TAX I.D. NO. (If more than one, state all)
265-81-2049

SOC. SEC./TAX I.D. NO. (If more than one, state all)

STREET ADDRESS OF DEBTOR (No. and street, city, state, zip)
715 Sir Francis Drake Blvd.
San Anselmo, CA 94960

Phone: (415) 456-8450 Work: Same

County of Residence or Principal Place of Business
Marin

STREET ADDRESS OF JOINT DEBTOR (No. and street, city, state, zip)

County of Residence or Principal Place of Business

MAILING ADDRESS OF DEBTOR (If different from street address)
SAME

MAILING ADDRESS OF JOINT DEBTOR (If different from street address)

LOCATION OF PRINCIPAL ASSETS OF BUSINESS DEBTOR (If different from above)
NOT APPLICABLE

VENUE
☒ Debtor has been domiciled or has had a residence, principal place of business, or principal assets in the District for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other District.
☐ There is a bankruptcy case concerning debtor's affiliate, general partner, or partnership pending in this District.

INFORMATION REGARDING DEBTOR (Check applicable boxes)

TYPE OF DEBTOR
☒ Individual
☐ Joint (Husband and Wife)
☐ Partnership
☐ Other ____________
☐ Corporation Publicly Held
☐ Corporation Not Publicly Held
☐ Municipality

NATURE OF DEBT
☒ Non-Business/Consumer ☐ Business-Complete A & B below

A. TYPE OF BUSINESS (Check one box)
☐ Farming
☐ Professional
☐ Retail/Wholesale
☐ Railroad
☐ Transportation
☐ Manufacturing/Mining
☐ Stockbroker
☐ Commodity Broker
☐ Construction
☐ Real Estate
☐ Other Business

B. BRIEFLY DESCRIBE NATURE OF BUSINESS

JEFFRY G. LOCKE, Trustee
P. O. Box 488
Kentfield, CA 94914-0488

CHAPTER or SECTION of BANKRUPTCY CODE UNDER WHICH the PETITION is FILED
☒ Chapter 7 ☐ Chapter 11 ☐ Chapter 13
☐ Chapter 9 ☐ Chapter 12 ☐ Sec. 304-Case Ancillary to Foreign Proceeding

FILING FEE (Check one box)
☒ Filing fee attached.
☐ Filing fee to be paid in installments. (Applicable to individuals only.) Must attach signed application for the court's consideration certifying that the debtor is unable to pay fee except in installments. Rule 1006(b). See Official Form No. 3.

NAME AND ADDRESS OF LAW FIRM OR ATTORNEY

Telephone No.

NAME(S) OF ATTORNEY(S) DESIGNATED TO REPRESENT THE DEBTOR

95 10911

☒ Debtor is not represented by an attorney. Phone: (415) 456-8450

STATISTICAL/ADMINISTRATIVE INFORMATION (U.S.C. § 604)(Estimates only) (Check applicable boxes)

☐ Debtor estimates that funds will be available for distribution to unsecured creditors.
☒ Debtor estimates that, after any exempt property is excluded and administrative expenses paid, there will be no funds available for distribution to unsecured creditors.

ESTIMATED NUMBER OF CREDITORS

1-15	16-49	50-99	100-199	200-999	1000-over
☒	☐	☐	☐	☐	☐

ESTIMATED ASSETS (In thousands of dollars)

Under 50	50-99	100-499	500-999	1000-9999	10,000-99,999	100,000-over
☒	☐	☐	☐	☐	☐	☐

ESTIMATED LIABILITIES (In thousands of dollars)

Under 50	50-99	100-499	500-999	1000-9999	10,000-99,999	100,000-over
☐	☐	☐	☐	☒	☐	☐

ESTIMATED NUMBER OF EMPLOYEES - CH. 11 & 12 ONLY

0	1-19	20-99	100-999	1000-over
☐	☐	☐	☐	☐

ESTIMATED NUMBER OF EQUITY SECURITY HOLDERS - CH. 11 & 12 ONLY

0	1-19	20-99	100-499	500-over
☐	☐	☐	☐	☐

THIS SPACE FOR COURT USE ONLY

ORIGINAL FILED
ORDER FOR RELIEF.
95 APR 19 AM 11:32
KEENAN G. CASADY, CLERK
U.S. BANKRUPTCY COURT
NORTHERN DIST. OF CA.
SANTA ROSA, CA.

PROOF OF SERVICE

I am employed in the county of Marin, State of California. I am over the age of eighteen years and not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California 94960. I served the foregoing document(s) described as:

GERALD ARMSTRONG'S NOTICE OF FILING CHAPTER 7 BANKRUPTCY PETITION

on the following persons on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

Laurie J. Bartilson, Esquire — FAX & MAIL
BOWLES & MOXON
6255 Sunset Boulevard, Suite 2000
Los Angeles, CA 90028

Andrew H. Wilson, Esquire — FAX & MAIL
Wilson, Ryan & Campilongo
115 Sansome Street, Suite 400
San Francisco, CA 94104

Michael L. Walton, Esquire — FAX & MAIL
P.O. Box 751
San Anselmo, CA 94979

☒ (By Mail) I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.

☐ (Personal) I caused said papers to be personally served on the office of counsel.

☒ (State) I declare under the penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: April 19, 1995

MARIN COU COURTS
LAW & MOTION - CIVIL CALENDAR
April 21, 1995

9:00 am DEPARTMENT: 01 Honorable Gary W. Thomas REPORTER: J. KNETZGER CLERK: J. BANKSON

CASE #	INV.	PERSON/PARTY NAME	ATTORNEY FIRM	HEARING TYPE
9-CIV 157680		**CHURCH OF SCIENTOLOGY INTERNATIONAL VS. GERALD ARMSTRONG ET AL**		
	PLTF:	CHURCH OF SCIENTOLOGY INTERNA	BARTILSON, LAURIE J. Wilson, Ryan Et Al Wilson, Andrew Harris	MOTION FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF 2ND AMENDED COMPLAINT (PLTF) CHURCH OF SCIENTOLOGY INTERNATIONAL - CONT. 1
	DEFT:	ARMSTRONG, GERALD	PRO PER	
	DEFT:	BEHBEHANI-WALTON, SOLINA		
	DEFT:	THE GERALD ARMSTRONG CORPORAT	PRO PER	
	DEFT:	WALTON, MICHAEL	PRO PER	
	CRCO:	ARMSTRONG, GERALD	PRO PER	
	CRDF:	CHURCH OF SCIENTOLOGY INTERNA	BARTILSON, LAURIE J. Wilson, Ryan Et Al Wilson, Andrew Harris	

CLS-gjh

AS DEFENDANT HAS FILED BANKRUPTCY, THIS ACTION IS STAYED. MATTER IS SET ON AUGUST 3, 1995 AT 9:00 A.M. FOR A STATUS CONFERENCE AND HEARING OF MOTION.

CASE #	INV.	PERSON/PARTY NAME	ATTORNEY FIRM	HEARING TYPE
10-CIV 159043		**CHARLES H. CLONIGER VS. MARIJO BAIRD**		
	PLTF:	Cloniger, Charles H.	Meredith, Roger Louis	MOTION TO BE RELIEVED AS ATTORNEY OF RECORD (DEFT) Marijo Baird (DEFT) Redwood Health Care
	DEFT:	Baird, Marijo	Senneff Bernheim et al Miller, Michael Gregory	
	DEFT:	Redwood Health Care	Senneff Bernheim et al Miller, Michael Gregory	

NO OPPOSITION AND GOOD CAUSE APPEARING, THE MOTION TO BE RELIEVED AS ATTORNEY OF RECORD IS GRANTED.

MARIN COU COURTS
LAW & MOTION - CIVIL CALENDAR
April 28, 1995

9:00 am DEPARTMENT: 01 Honorable Gary W. Thomas REPORTER: J. KNETZGER CLERK: J. BANKSON

CASE #	INV.	PERSON/PARTY NAME	ATTORNEY FIRM	HEARING TYPE
4- CIV 157680		**CHURCH OF SCIENTOLOGY INTERNATIONAL VS. GERALD ARMSTRONG ET AL**		
	PLTF:	CHURCH OF SCIENTOLOGY INTERNA	BARTILSON, LAURIE J. Wilson, Ryan Et Al Wilson, Andrew Harris	MOTION FOR TERMINATING OR EVIDENTIARY SANCTIONS AGAINST DEFT. GERALD ARMSTRONG (PLTF) CHURCH OF SCIENTOLOGY INTERNATIONAL
	DEFT:	ARMSTRONG, GERALD	PRO PER	
	DEFT:	BEHBEHANI-WALTON, SOLINA		
	DEFT:	THE GERALD ARMSTRONG CORPORAT	PRO PER	
	DEFT:	WALTON, MICHAEL	PRO PER	
	CRCO:	ARMSTRONG, GERALD	PRO PER	
	CRDF:	CHURCH OF SCIENTOLOGY INTERNA	BARTILSON, LAURIE J. Wilson, Ryan Et Al Wilson, Andrew Harris	

MOTION FOR TERMINATING OR EVIDENTIARY SANCTIONS AGAINST DEFENDANT GERALD ARMSTRONG IS STAYED DUE TO BANKRUPTCY PETITION OF PLAINTIFF.

5855

SUPERIOR COURT OF CALIFORNIA, MARIN COUNTY

DATE: Aug 3, 1995 TIME: 9:00 [✓ A.M.]/P.M. JUDGE Gary W. Thomas DEPT. NO. 1

DEPUTY CLERK J. Bankson REPORTER J. Kretzger

TITLE: Church of Scientology International Plaintiff(s) vs. Gerald Armstrong, et al Defendant(s)	COUNSEL: Andrew Wilson no appearance

Nature Of Proceedings: **STATUS/ADR CONFERENCE** ACTION NO. 157680

CLIENTS PRESENT: ___ Plaintiff ___ Defendant ___ Carrier ___ Other ___________.

___ Parties stipulate/are ordered to Non-Binding Private/Judicial Arbitration, to be completed by: ___________.

___ Parties agree to Mediation and must also agree on a Mediator within ___________ calendar days from this date.
If parties cannot agree, on a mediator:
___Counsel are each to submit two names within ___________ calendar days for the Court's selection.
___Plaintiff's counsel shall so advise the Court in writing and the Court will select a Mediator for them.

___ Discovery cutoff date: ___________.

___ Mediation to be commenced/completed by: ___________.

FILED
AUG 3 1995
HOWARD HANSON
MARIN COUNTY CLERK
By J. Bankson, Deputy
J Bankson

THE COURT MAKES THE FOLLOWING ORDERS:

___ **SANCTIONS:** Sanctions are to be paid by ___________ to ___________ in the sum of $___________ no later than ___________ for the following reason: ___________.

___ **FUTURE STATUS CONFERENCE** Date: ___________ Time: 9:00 A.M.

___ **MANDATORY SETTLEMENT CONFERENCE** Date: ___________ Time: ___________.
Pursuant to Rule 5.10(b), ten (10) court days before the Settlement Conference, counsel/party shall lodge an original and two (2) copies of the Settlement Conference Statement in the Calendar Department, Room 255. Failure to do so will result in a daily sanction of $49.00, payable at the time of lodging statement.

___ **ISSUE CONFERENCE** Date: ___________ Time : ___________.
Note: Any In-Limine Motions are to be filed with the Issue Conference Statement.

___ No appearance necessary by ___________ if (Conditions) ___________.

___ **TRIAL** Date: ___________ Time: ___________ Jury: ______ Court: ______ Estimate: ___________ days.
All parties waive notice of trial.

___ **OSC ORDERED** Date: ___________ Time: ___________ For the following reasons:

___ Matter is ordered transferred to Municipal Court; ___________ to pay transfer fees.

___ Matter is ordered DISMISSED for (Reason) ___________; Clerk to notify parties.

AS ejb

OTHER ORDERS: Bankruptcy stay has been lifted. Plaintiff's Motion for Summary Adjudication is set for hearing on Sept. 29, 1995 at 9:00 am in Dept. One.

Approved as to form:

Counsel for Plaintiff

Counsel for Defendant

Counsel

Counsel

Gary W. Thomas
JUDGE OF THE SUPERIOR COURT

White=File;
Yellow=Counsel; Acct.
Pink=Cal. Dept. Arb.

Rev. July 1993

STATUS/ADR CONFERENCE MINUTE ORDER

ORIGINAL

5856

Law Offices
HUB LAW OFFICES
711 Sir Francis Drake Boulevard
San Anselmo, California 94960
(415) 258-0360

FORD GREENE, Bar # 107601

Attorney for Defendant
GERALD ARMSTRONG

(SPACE BELOW PROVIDED FOR FILING STAMP ONLY)

FILED
SEP 15 1995
HOWARD HANSON
MARIN COUNTY CLERK
by J. Steele, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profitreligious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION, a California for-profit corporation; DOES 1 through 100, inclusive,

Defendants.

No. 157 680

SUBSTITUTION OF ATTORNEY

TO THE CLERK OF THE ABOVE-ENTITLED COURT AND TO ALL PARTIES AND THEIR COUNSEL:

Defendant Gerald Armstrong hereby substitutes Ford Greene, Attorney at Law, 711 Sir Francis Drake Boulevard, San Anselmo, California 94960-1949, Telephone (415) 258-0360 as attorney of record in the place and stead of Gerald Armstrong, in pro per.

DATED: 9/14/95

G. Arm

GERALD ARMSTRONG
Defendant

4

I consent to the above substitution.

DATED: 9/14/95

~~HUB LAW OFFICES~~

By:

FORD GREENE

I accept the above substitution.

DATED: 9/14/95

GERALD ARMSTRONG
Defendant

PROOF OF SERVICE

I am employed in the county of Marin, State of California. I am over the age of eighteen years and not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California 94960. I served the foregoing document(s) described as:

SUBSTITUTION OF ATTORNEY

on the following persons on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

Laurie J. Bartilson, Esquire
MOXON & BARTILSON
6255 Sunset Boulevard, Suite 2000
Los Angeles, CA 90028

AndAndrew H. Wilson, Esquire
WiWILSON, RYAN & CAMPILONGO
115 Sansome Street, Suite 400
San Francisco, CA 94104

Michael L. Walton, Esquire
P.O. Box 751
San Anselmo, CA 94979

[X]	(By Mail)	I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.
[ ]	(Personal)	I caused said papers to be personally served on the office of counsel.
[X]	(State)	I declare under the penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: September 15, 1995

ORIGINAL

Law Offices
HUB LAW OFFICES
711 Sir Francis Drake Boulevard
San Anselmo, California 94960
(415) 258-0360

FORD GREENE, Bar # 107601

Attorney for Defendant
GERALD ARMSTRONG

(SPACE BELOW PROVIDED FOR FILING STAMP ONLY)

5859

FILED

SEP 15 1995

HOWARD HANSON
MARIN COUNTY CLERK
by J. Steele, Deputy

J. Steele

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION, a California for-profit corporation; DOES 1 through 100, inclusive,

Defendants.

No. 157 680

ARMSTRONG'S EX PARTE APPLICATION FOR ORDER ALLOWING FILING OF OPPOSITION TO MOTION FOR SUMMARY JUDGMENT/ ADJUDICATION; DECLARATION OF FORD GREENE; ORDER

Date: September 15, 1995
Time: 9:30 a.m.
Dept: One
Trial Date:

TO: CHURCH OF SCIENTOLOGY INTENTIONAL AND ITS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on September 15, 1995, At 9:30 a.m., in Department 1 of the above-entitled Court, located at the Hall of Justice, Marin County Civic Center, San Rafael, California, defendant Gerald Armstrong, by and through his attorney of record, Ford Greene, will seek an ex parte order allowing him to file and personally serve oppositions to the pending motions for summary judgment/adjudication on or before 10:00 a.m. on Monday, September 18, 1995.

This ex parte application is based upon the ground that it would be unfair to preclude

Armstrong from opposing said motions particularly when the grant thereof would have the effect of depriving Armstrong of important and fundamental rights.

The legal basis for the instant application includes, but is not limited to California Rule of Court 379, and Local Rule 2.10.

This ex parte application is based upon this notice, the attached Declaration of Ford Greene, the court's files and records in this case and such other material as is presented in support of the application.

DATED: September 15, 1995

~~HUB LAW OFFICES~~

By: ____________________
FORD GREENE
Attorney for Defendant
GERALD ARMSTRONG

DECLARATION OF FORD GREENE

FORD GREENE declares:

1. I am an attorney licensed to practice law in the Courts of the State of California and am the attorney of record for GERALD ARMSTRONG, defendant herein. I previously represented Armstrong in this litigation, however, on February 23, 1995, I substituted out of the case with Armstrong thereafter appearing *in pro per* until now.

2. On September 14, 1995, defendant Armstrong applied ex *parte* to the Court for an Order allowing him to file oppositions to the two pending motions for summary adjudication, and for an Order allowing said oppositions to be filed and personally served on or before 10:00 a.m. on September 18, 1995. Judge Gary W. Thomas indicated his inclination to deny defendant's application for both orders and continued the hearing to September 15, 1995 for the purpose of clarifying whether or not defendant Armstrong had already submitted oppositions in which case the grant of the Orders sought herein would unfairly allow Armstrong "two bites of the apple."

3. The procedural history of the two pending motions for summary adjudication is as follows:

First C.C.P. section 437c Motion

a. Plaintiff's motion for summary adjudication of the twentieth cause of action seeking a permanent injunction was filed on February 23, 1995 noticing a hearing for March 31, 1995. It included within its scope a third-party non-profit corporation, FactNet, that was managed by one Lawrence Wollersheim;

b. On March 10, 1995 the Court granted Armstrong's *in pro per ex parte* application to continue the hearing on the summary adjudication motion re the twentieth cause of action for two weeks to April 14, 1995;

Second C.C.P. section 437c Motion

c. Plaintiff's motion for summary adjudication of the thirteenth, sixteenth, seventeenth and nineteenth causes of action was filed on March 17, 1995.

d. On March 29, 1995 the Court granted Armstrong's *in pro per ex parte* application to continue the hearing on the summary adjudication motion re the thirteenth, sixteenth, seventeenth, nineteenth and twentieth causes of action to April 21, 1995;

e. On April 7, 1995 the Court denied Armstrong's *in pro per ex parte* application to continue the hearing on the summary adjudication motion re the thirteenth, sixteenth, seventeenth, nineteenth and twentieth causes of action.

The Wollersheim Declaration

f. Included in Scientology's proposed Order of Permanent Injunction on the twentieth cause of action was the following language:

> "1. Remove all information concerning Scientology, the Church and/or any person referred to in paragraph 1 of the "Mutual Release of All Claims and Settlement Agreement" of December, 1986, from any and all data bases, electronic or otherwise, within the possession, custody or control of FACTNet;"

f. On April 10, 1995, Armstrong filed the Declaration of Lawrence Wollersheim in an effort to protect FactNet from being subjected to inclusion within any court ordered permanent injunction. This is the only paper that Armstrong has filed in opposition to the motions for summary adjudication. He has filed no separate statements and no points and authorities. Therefore, Armstrong's sole submission is legally insufficient and is thus an ineffective opposition to the pending motions.

Armstrong's Bankruptcy Filing

4. On April 19, 1995, Armstrong sought the protection of the bankruptcy court which issued an automatic stay of the instant action.

5. On April 20, 1995, this Court ordered the instant action stayed and set a status conference for August 3, 1995.

Current Status

6. On August 3, 1995, this Court set the hearing on the two pending summary adjudication motions for September 29, 1995.

7. A hearing on plaintiff's two motions for summary judgment/adjudication is set herein on September 29, 1995. Defendant's opposition papers to both motions shall therefore be filed and served on or before September 15, 1995.

Armstrong's Need For Relief

8. I am informed and believe that the hearing on the motion was previously set, but not heard because defendant had filed for relief in the bankruptcy court which had issued a stay to this court. I am further informed and believe that before the stay issued from the bankruptcy court, Mr. Armstrong was in pro per and, but for an effort to prevent the Court from bringing FactNet within the scope of any permanent injunction failed to timely file his opposition papers to the then-pending C.C.P. section 437c motions. Thus, he is technically is default with respect thereto.

9. As part of Armstrong's bankruptcy litigation, on May 15, 1995, he filed and served upon Church of Scientology International a separate statement and supporting evidence that was what he would have liked to have filed in this Court in opposition to the then-pending C.C.P. section 437c motions, but did not. Thus, for four months, CSI has been on notice as to the factual basis for Armstrong's opposition to said motion. (Factual support in this regard is set forth in the Declaration of Gerald Armstrong which is attached hereto.) Thus, Scientology will not be prejudiced by allowing Armstrong a full opportunity to litigate his opposition to the pending summary adjudication motions.

10. I have personally reviewed the factual basis solely gathered by defendant Armstrong which was served on Scientology on May 15, 1995, and upon which he bases his oppositions to the currently pending summary judgment motions. I believe them to be meritorious. The essence of such merit is that as part of the settlement agreement, Scientology promised not to engage in any further fair game activities against Armstrong which included a promise not to reveal any facts about Armstrong relating to the time period preceding the settlement. Prior to any claimed breach of the agreement by Armstrong, Scientology repeatedly breached its promises to Armstrong by publishing and distributing false statements about Armstrong to the courts and to the press in the United States and abroad. ***These facts have not previously been presented to this Court***. Therefore, as to the enforcement of the contract, Armstrong is prepared to present a factually based defense at least on the grounds of fraud and on the failure of consideration as a discharge of Armstrong's duty to perform. Separate Statements and Evidence in Support thereof in opposition to the pending motions are presently completed and ready for filing (as mentioned Scientology has had service of these

papers since May 15, 1995).

11. If Armstrong cannot file these papers he will prejudiced because he will have been deprived of the opportunity to participate in a hearing the likely result of which will be orders seriously impacting the fundamental constitutional rights to free speech, freedom of religion and the right to employment.

12. The only papers in opposition that are not prepared at the time of the submission of this *ex parte* application are the opposing points and authorities.

13. It will be extremely difficult, if not impossible, for me to adequate prepare both oppositions by today. Mr. Armstrong, however one may consider him, is deserving of an adequate defense. His rights, which hang in the balance, are as important as any which are fundamental to our democracy.

14. I have been reluctant to accept further representation in this case because it is pro bono, however, I believe that both the issues and rights at stake are fundamental. In addition, I believe that Mr. Armstrong should not be compelled to endure any attempt at the wholesale destruction of his rights without the benefit of being represented by a lawyer. Thus, I request a brief extension of time so that I can properly do my job.

Relief Requested

15. With the foregoing in mind, I would like two orders. First, I would like an order allowing Armstrong to file an opposition to the pending summary adjudication motion. Second, I would like an order allowing such opposition to be filed and personally served on Mr. Wilson's office by 10:00 a.m. on September 18, 1995.

Request to Preserve Appellate Record

16. Finally, if the Court denies Armstrong permission to file any papers in opposition to the motions, he would like permission to file or lodge with the Court today the papers that he would have filed in opposition to the motions so that the record is complete for the purposes of appeal.

17. I have given notice of the present application for ex parte orders to counsel for plaintiff in the following manner:

By advising counsel after yesterday's *ex parte* application that an additional application would be made today.

I received the following response to said notice: Mr. Wilson will appear.

Under penalty of perjury pursuant to the laws of the State of California I hereby declare that the foregoing is true and correct according to my first-hand knowledge, except those matters stated to be on information and belief, and as to those matters, I believe them to be true.

Executed on September 15, 1995, at San Anselmo, California

DECLARATION OF GERALD ARMSTRONG

I, Gerald Armstrong, declare:

1. I have personal knowledge of the facts set forth in this declaration and could competently testify thereto if called as a witness.

2. On April 19, 1995, I filed a petition for Chapter 7 bankruptcy in the Northern District, Case No. 95-10911 aj. On April 26, 1995 Scientology, filed a motion for relief from the automatic stay. One of its claims in its motion was that all of my defenses had been eliminated by the State Court. They had not been at any time. I had simply not had the resources or time to assemble the mass of documentation and prepare my separate statements and oppositions to Scientology's two summary adjudication motions; and the State Court had not granted my request for adequate time in April, 1995 to do so.

3. On May 15, 1995, therefore, in order to show that I had real defenses, which had not been adjudicated, and in order to show that I had put enormous effort into assembling the evidence to support these defenses, I filed my opposition to Scientology's relief from stay, which included as evidence my separate statement of disputed and undisputed facts in opposition to Scientology's summary adjudication motion of its twentieth cause of action of its second amended complaint, which is 134 pages in length, plus all my evidence cited to in the separate statement. This separate statement and all of the evidence cited to therein were served on Scientology on May 15. A copy of the proof of service showing service of my opposition and evidence containing all these papers is appended hereto as Exhibit A.

4. The evidence which I will use to support my oppositions

to Scientology's two pending summary adjudication oppositions is identical to the evidence served on Scientology on May 15. The separate statement in opposition to Scientology's motion for summary adjudication of its twentieth cause of action is identical to that served on Scientology on May 15. The separate statement in opposition to Scientology's motion for summary adjudication of its thirteenth, fourteenth, seventeenth and nineteenth causes of action, along with one declaration without exhibits which is specific to that motion, has not been served on Scientology. The bulk of that separate statement, however, is identical to the separate statement in opposition to Scientology's motion for summary adjudication of its twentieth cause of action.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at San Anselmo, California, on September 14, 1995

G.

GERALD ARMSTRONG

PROOF OF SERVICE

I am employed in the county of Marin, State of California. I am over the age of eighteen years and not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California 94960. I served the foregoing document(s) described as:

> **GERALD ARMSTRONG'S DECLARATION IN OPPOSITION TO SCIENTOLOGY'S MOTION FOR RELIEF FROM STAY; GERALD ARMSTRONGS EVIDENCE OPPOSITION TO SCIENTOLOGY'S MOTION FOR RELIEF FROM STAY** - VOLUMES I - VII

on the following persons on the date set forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

Laurie J. Bartilson, Esquire
BOWLES & MOXON
6255 Sunset Boulevard, Suite 2000
Los Angeles, CA 90028

Jeffry G. Locke, Trustee
P.O. Box 488
Kentfield, CA 94914-0488

[X]	(By Mail)	I caused such envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California.
[ ]	(Personal)	I caused said papers to be personally served on the office of counsel.
[X]	(State)	I declare under the penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: May 17, 1995

ORIGINAL
5869

Law Offices
HUB LAW OFFICES
711 Sir Francis Drake Boulevard
San Anselmo, California 94960
(415) 258-0360

FORD GREENE, Bar # 107601

Attorney for Defendant
GERALD ARMSTRONG

(SPACE BELOW PROVIDED FOR FILING STAMP ONLY)

FILED
SEP 15 1995
HOWARD HANSON
MARIN COUNTY CLERK
by J. Steele, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation,

Plaintiff,

vs.

GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION, a California for-profit corporation; DOES 1 through 100, inclusive,

Defendants.

No. 157 680

ORDER

On September 15, 1995 defendant Gerald Armstrong presented his *ex parte* application regarding plaintiff's pending motions for summary adjudication. Mr. Armstrong was represented by his attorney, Ford Greene, and plaintiff Church of Scientology International was represented by Andrew H. Wilson, one of its attorneys.

///

///

///

///

Pla. atty

GOOD CAUSE appearing therefore, the Court ORDERS as follows:

1. Defendant Gerald Armstrong may file an opposition to the motion for summary adjudication set for hearing herein on September 29, 1995.

☒ GRANTED GWT

☐ DENIED

☐ MODIFIED

2. Defendant Gerald Armstrong may file and personally serve on Mr. Wilson's Office said opposition on or before 10:00 a.m. on September 18, 1995.

☒ GRANTED GWT

☐ DENIED

☐ MODIFIED

3. Defendant Gerald Armstrong may lodge with the Court the papers that he would have filed in opposition to the pending motions for summary adjudication in order to preserve the record with respect to his rights on appeal.

☐ GRANTED

☒ DENIED GWT

☐ MODIFIED

any Reply to be filed + served by Sept 25, 1995 by 11AM GWT

DATED: September 15, 1995

Gary W. Thomas
Judge of the Superior Court

ORIGINAL

FILED

SEP 18 1995

HOWARD HANSON 5871
MARIN COUNTY CLERK
by J. Steele, Deputy

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450
In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation, Plaintiff, vs. GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive, Defendants.	No. 157 680 **EVIDENCE IN SUPPORT OF OPPOSITION TO MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT** Date: 9/29/95 Time: 9:00 a.m. Dept: One Trial Date: Not Set

VOLUME I

VOLUME I

EXHIBIT 1: Declaration of Gerald Armstrong in Opposition to Motions for Summary Adjudication of 20th Cause of Action; and 13th, 16th, 17th & 19th Causes of Action of Second Amended Complaint, Authenticating Deposition Transcripts and Exhibits.

EXHIBIT 1(A): Declaration of Gerald Armstrong, executed March 15, 1990, and Authenticating Exhibits.

EXHIBIT 1(A)(A): Memorandum of Decision dated June 20, 1984 in Scientology v. Armstrong, LA Superior Court No. C 420153.

EXHIBIT 1(A)(B): Opinion of California Court of Appeal dated December 18, 1986 in Scientology v. Armstrong, Case No. B005912.

EXHIBIT 1(A)(C): Deposition subpena dated September 28, 1989 in Corydon v. Scientology, LASC No. C 694 401.

EXHIBIT 1(A)(D): Notice of Motion and Motion by Defendant Author Services, Inc to Delay or Prevent the Taking of Certain Third Party Depositions by Plaintiff dated November 1, 1989 in Corydon.

EXHIBIT 1(A)(E): Excerpts from 1987 Scientology "Dead Agent" document.

EXHIBIT 1(A)(F): First Affidavit of Kenneth Long executed October 5, 1987 and filed in Scientology v. Miller & Penguin Books, High Court of Justice, London, England, Case No. 1987 C 6140.

EXHIBIT 1(A)(G): Second Affidavit of Kenneth Long executed October 5, 1987 and filed in Miller.

EXHIBIT 1(A)(H): Third Affidavit of Kenneth Long executed October 5, 1987 and filed in Miller.

EXHIBIT 1(A)(I): First Affidavit of Sheila Chaleff executed October 5, 1987 and filed in Miller.

EXHIBIT 1(A)(J): Fourth Affidavit of Kenneth Long executed October 7, 1987 and filed in Miller.

EXHIBIT 1(A)(K): Fifth Affidavit of Kenneth Long executed October 8, 1987 and filed in Miller.

EXHIBIT 1(A)(L): Affidavit of Gerald Armstrong, executed March 7, 1986.

EXHIBIT 1(A)(M): Letter dated December 27, 1988 from Michael Flynn to Clerk, California Court of Appeal; Response of Gerald Armstrong to Opposition Filed by Real Party in Interest, Bent Corydon dated December 27, 1988.

EXHIBIT 1(A)(N): Business card of Eugene M, Ingram on copy face of videocassette.

EXHIBIT 1(A)(O): Civil Subpena in Scientology v. Yanny, LASC No. C 690211, dated November 29, 1989.

EXHIBIT 1(A)(P): Respondents's Petition for Permission to File Response and for an Extension of Time to File Response filed in the California Court of Appeal February 28, 1990 in Scientology v. Armstrong, Case No. B025920.

EXHIBIT 1(A)(Q): Defendants's Petition for Permission to File Response and for Time to File filed in the California Court of Appeal March 1, 1990 in Scientology v. Armstrong, Case No. B038975.

VOLUME II

EXHIBIT 1(B): Declaration of Gerald Armstrong, executed December 25, 1990, and Authenticating Exhibits.

EXHIBIT 1(B)(A): Mutual Release and Settlement Agreement.

EXHIBIT 1(B)(B): Appellant's Opposition to Defendant's Petition for Permission to File Response and for Time to File, filed in the California Court of Appeal March 6, 1990 in Scientology v. Armstrong, Case No.

B038975.

EXHIBIT 1(B)(C): Defendant's Reply to Appellant's Opposition to Petition for Permission to File Response and for Time, filed in the California Court of Appeal March 24, 1990 in Scientology v. Armstrong, Case No. B038975.

EXHIBIT 1(B)(D): Notice of Motion and Motion for an Order Directing Non-Interference with Witnesses and Disqualification of Counsel, filed March 19, 1990 by plaintiff in Corydon, supra.

EXHIBIT 1(B)(E): Opposition of Defendants to Motion for an Order Directing Non-Interference with Witnesses and Disqualification of Counsel, filed March 27, 1990 in Corydon, supra.

EXHIBIT 1(B)(F): Declaration of Lawrence Heller executed March 27, 1989 and filed in Corydon, supra.

EXHIBIT 1(B)(G): Declaration of Kenneth Long executed March 26, 1989 and filed in Corydon, supra.

EXHIBIT 1(B)(H): Declaration of Gerald Armstrong, executed March 26, 1990.

EXHIBIT 1(B)(I): Civil subpena undated for April 24, 1990 deposition in Corydon, supra.

EXHIBIT 1(B)(J): Notes of Gerald Armstrong of

	telephone conversation with Lawrence Heller on October 23, 1989.
EXHIBIT 1(B)(K):	Notes of Gerald Armstrong of telephone conversation with Lawrence Heller on October 25, 1989.
EXHIBIT 1(B)(L):	Notes of Gerald Armstrong of telephone conversation with Lawrence Heller on November 20, 1989.
EXHIBIT 1(B)(M):	Transcript of Gerald Armstrong's side of telephone conversation with Lawrence Heller on November 20, 1989.
EXHIBIT 1(B)(N):	Final Adverse Ruling of Internal Revenue Service to Church of Spiritual Technology dated July 8, 1988.
EXHIBIT 1(B)(O):	Declaration of Gerald Armstrong, executed October 11, 1986.
EXHIBIT 1(B)(P):	Declaration of Gerald Armstrong, executed November 1, 1986.

VOLUME III

EXHIBIT 1(C): Opinion of California Court of Appeal dated July 29, 1991 in Scientology v. Armstrong, Case No. B 025920, B 038975.

EXHIBIT 1(D): Scientology's Notice of Motion and Motion to Seal Record on Appeal, filed September 11, 1991 in Scientology v. Armstrong, Case No. B 025920, B 038975.

EXHIBIT 1(E): Gerald Armstrong's Opposition to Motion to Seal Record on Appeal, filed October 15, 1991 in Scientology v. Armstrong, Case No. B 025920, B 038975.

EXHIBIT 1(E)(A): Complaint for Damages for And Injunctive Relief from Fourth Amendment Violations; First Amendment Violations; Due Process Violations Under the Fifth Amendment; and Equal Protection Violations Under the Fifth Amendment, in Scientology v. Xanthos, et al. US District Court, Central District of California, Case No. 91-4301 SVW(Tx) filed August 12, 1991

EXHIBIT 1(E)(B): Scientology's Further Response to Order of July 2, 1985; Request for Stay, filed January 22, 1986 in Scientology v. Armstrong, LA Superior Court No. C 420153.

EXHIBIT 1(E)(C): Scientology's Supplemental Memorandum in Support of Defendant's Motion to Dismiss Complaint with Prejudice, filed August 26, 1991 in the Case of Aznaran v. Scientology, US District Court, Central District of California, Case No. CV 88-1786 JMI.

EXHIBIT 1(E)(D): Reply in Support of Defendants'

Motion for Summary Judgment Based on Statute of Limitations, filed August 26, 1991 in Aznaran.

EXHIBIT 1(E)(E): Declaration of Gerald Armstrong Regarding Alleged "Taint" of Joseph A. Yanny executed September 3, 1991 and filed in Aznaran.

EXHIBIT 1(E)(F): Defendants' Opposition to Ex Parte Application to File Plaintiff's Opposition to Defendants' Motion to Dismiss Complaint with Prejudice, filed August 30, 1991 in Aznaran.

EXHIBIT 1(E)(G): Final Adverse Ruling of Internal Revenue Service to Church of Spiritual Technology dated July 8, 1988.

EXHIBIT 1(E)(H): Page 70 of Plaintiff's Exhibits to Complaint filed October 6, 1988 in Church of Spiritual Technology v. US, Case No. 581-88T in the US Court of Claims.

EXHIBIT 1(E)(I): Pages 370-372 from Miller, Russell, Bare-Faced Messiah: The True Story of L. Ron Hubbard.

EXHIBIT 1(E)(J): Pages 238-249 from Corydon, Bent and Hubbard, L. Ron, Jr., L. Ron Hubbard, Messiah or Madman?

EXHIBIT 1(E)(K): Pages 328-334 from Atack, Jon, A Piece of Blue Sky: Scientology, Dianetics and L. Ron Hubbard Exposed.

EXHIBIT 1(E)(L): Order Allowing the United States of America to Examine and Copy Exhibits 5-K, 5-L, 5-O, 5-P and 6-O dated August 27, 1991 and filed in Scientology v. Armstrong, LA Superior Court No. C 420153.

EXHIBIT 1(F): Order of California Court of Appeal denying Motion to Seal Record dated December 5, 1991 in Scientology v. Armstrong, Case No. B 025920, B 038975.

VOLUME IV

EXHIBIT 1(G): Declaration of Gerald Armstrong in Opposition to Scientology's Motion for Preliminary Injunction, executed March 16, 1992, and Authenticating Exhibits.

EXHIBIT 1(G)(A): "Attacks on Scientology," Scientology Policy Letter by L. Ron Hubbard dated February 25, 1966.

EXHIBIT 1(G)(B): Excerpt from article "Dissemination of Material" by L. Ron Hubbard from booklet "Magazine Articles on Level O Checksheet."

EXHIBIT 1(G)(C): "Penalties for Lower Conditions," Scientology Policy Letter by L. Ron Hubbard dated October 18, 1967.

EXHIBIT 1(G)(L): "Settlement Agreement" between attorney Michael J. Flynn and his clients in December, 1986.

EXHIBIT 1(G)(M) Letter from Phillip Rodriguez dated November 7, 1984 purporting to authorize eavesdropping on Gerry Armstrong and Michael J. Flynn.

EXHIBIT 1(G)(N): Public Announcement of Los Angeles Police Chief Daryl Gates dated April 23, 1985.

EXHIBIT 1(G)(O): Letter from Los Angeles County Deputy District Attorney Robert N. Jorgenson to Scientology officials dated April 25, 1986.

EXHIBIT 1(G)(P): "Dept of Government Affairs," Scientology Policy Letter by L. Ron Hubbard dated August 15, 1960.

EXHIBIT 1(H): Declaration of Gerald Armstrong, executed January 13, 1994, and Authenticating Exhibits.

EXHIBIT 1(H)(F): Declaration of US District Court Judge James M. Ideman, executed June 17, 1993.

EXHIBIT 1(H)(P): "A Crash Course in Speculation," article by Gerald Armstrong dated 1989.

EXHIBIT 1(H)(R): Letter from Gerald Armstrong dated April 23, 1990 to Theresa Zraggen in the IRS.

EXHIBIT 1(H)(R)(A): Information Document Request dated February 26, 1990, issued to Gerald

Armstrong by IRS re 1987 audit.

EXHIBIT 1(H)(R)(B): United States Supreme Court opinion in *US v. Zolin*, 89 C.D.O.S.4616, filed June 21, 1989.

EXHIBIT 1(H)(R)(C): "Freedom" published by Scientology April/May, 1985.

EXHIBIT 1(H)(R)(X): Advertisements by Gerald Armstrong in "Common Ground," in 1989.

EXHIBIT 1(H)(R)(CC): Letter from Gerald Armstrong to Jonathan Marshall dated July 28, 1987; letter from Gerald Armstrong to "Dear Captors" dated July 28, 1987.

EXHIBIT 1(H)(R)(DD): Writing by Gerald Armstrong dated December 31, 1987.

EXHIBIT 1(H)(R)(EE): "Margaret," drawing by Gerald Armstrong.

EXHIBIT 1(H)(R)(FF): "Mitzi," drawing by Gerald Armstrong.

EXHIBIT 1(H)(S): Letter from Gerald Armstrong to Jonathan Marshall dated October 14, 1989 with article "A Crash Course in

Speculation,"

EXHIBIT 1(H)(Z): Letter from Gerald Armstrong dated October 23, 1992 to Republican National Committee with recipients list, references list, "OUR Pledge," article "OUR Deadline," article "Present Currency," article "Wisdom Has No Downside," letter to Rick Polito, Marin Independent Journal, dated re "OUR Program"

EXHIBIT 1(H)(CC): "Squirrels," Scientology Office of Special Affairs Executive Directive dated September 20, 1984.

EXHIBIT 1(H)(DD): Ex parte Application for Order to Show Cause Why Gerald Armstrong Should Note Be Held in Contempt, filed December 31, 1992 in Scientology v. Armstrong, LASC No. BC 052395 (now Marin SC No. 157680).

VOLUME V

EXHIBIT 1(I): Declaration of Gerald Armstrong Executed August 12, 1984, and Authenticating Deposition Transcripts And Exhibits.

EXHIBIT 1(I)(A): Declaration of Nancy Rodes dated November 29, 1989.

EXHIBIT 1(I)(B): Certificate of Saint dated October 18, 1987.

EXHIBIT 1(I)(C):	Deposition testimony of Armstrong March 16, 1992 in Church of Scientology International v. Yanny, Los Angeles Superior Court, Case No. BC 033035 ("Yanny II")
EXHIBIT 1(I)(E):	Gerald Armstrong's prayer to God and His Answer dated August 13, 1990.
EXHIBIT 1(I)(F):	Deposition testimony of Gerald Armstrong July 22, 1992 in Church of Scientology International v. Armstrong, Los Angeles Superior Court, case No. BC 053295, now Marin SC No. 157680.
EXHIBIT 1(I)(G):	Deposition testimony of Michael Walton taken herein February 24, 1993.
EXHIBIT 1(I)(H):	Deposition testimony of Gerald Armstrong herein March 17, 1994.
EXHIBIT 1(I)(I):	Deposition testimony of Michael Walton herein March 18, 1993.
EXHIBIT 1(I)(J):	Letter from Gerald Armstrong to Andrew Armstrong dated August 20, 1990
EXHIBIT 1(I)(K):	Letter from Gerald Armstrong to Lorrie Eaton dated August 20, 1990.
EXHIBIT 1(I)(L):	Letter from Gerald Armstrong to Jerry Solfvin dated August 20, 1990.
EXHIBIT 1(I)(M):	Letter from Armstrong to Bruce, Tricia and Anne-Leigh (Dawson

Family) dated August 21, 1990.

EXHIBIT 1(I)(N): Letter from Gerald Armstrong to Michael and Kima Douglas ("Douglases") dated August 21, 1990.

EXHIBIT 1(I)(O): Letter from Douglases to Armstrong dated September 6, 1990.

EXHIBIT 1(I)(P): Promissory Note from Douglases to Armstrong dated July 28, 1987.

EXHIBIT 1(I)(Q): Promissory Note from Douglases to Armstrong dated June 3, 1988.

EXHIBIT 1(I)(R): Promissory Note from Douglases to Armstrong dated June 1, 1990.

EXHIBIT 1(I)(S): Note from Douglases to Armstrong dated June 1, 1988.

EXHIBIT 1(I)(T): Order of California Court of Appeal dated March 9, 1990 in Scientology v Armstrong, in Case No. B 025920, granting Permission to Responde in Appeal.

EXHIBIT 1(I)(U): Deposition testimony herein July 11 and July 26, 1994 of Lynn Farny ("Farny"), Secretary and corporate representative of plaintiff CSI.

EXHIBIT 1(I)(V): "Verbal Tech: Penalties" Scientology Policy Letter by L. Ron Hubbard dated February 15, 1979 and April 12, 1983.

EXHIBIT 1(I)(W): "Policy: Source Of" Scientology

Policy Letter by L. Ron Hubbard dated March 5, 1965.

EXHIBIT 1(I)(X): "Seniority of Orders" Scientology Policy Letter by L. Ron Hubbard dated August 9, 1972.

EXHIBIT 1(I)(Y): "Policy and Orders" Scientology Policy Letter by L. Ron Hubbard dated November 25, 1970.

EXHIBIT 1(I)(Z): "Suppressive Acts - Suppression of Scientology and Scientologists" Scientology Policy Letter by L. Ron Hubbard dated December 23, 1965, revised January 8, 1991.

EXHIBIT 1(I)(AA): "Suppressive Person Declare Gerry Armstrong" dated February 18, 1982.

EXHIBIT 1(I)(BB): "Suppressive Person Declare Gerry Armstrong" dated February 18, 1982, Revised April 22, 1982.

EXHIBIT 1(I)(CC): "Suppressive Persons and Suppressive Groups List, Flag Executive Directive" dated July 25, 1992.

EXHIBIT 1(I)(DD): "Squirrels," Scientology Office of Special Affairs Executive Directive dated September 20, 1984.

EXHIBIT 1(I)(EE): "Penalties for Lower Conditions," Scientology Policy Letter by L. Ron Hubbard dated October 18, 1967.

EXHIBIT 1(I)(FF): "Cancellation of Fair Game," Scientology Policy Letter by L. Ron

Hubbard dated October 21, 1968.

EXHIBIT 1(I)(GG): "How to Handle Black Propaganda," Scientology Policy Letter by L. Ron Hubbard dated November 21, 1972.

EXHIBIT 1(I)(HH): "Black PR," Scientology Policy Letter by L. Ron Hubbard dated May 11, 1971.

EXHIBIT 1(I)(II): Excerpt from article "Dissemination of Material" by L. Ron Hubbard from booklet "Magazine Articles on Level 0 Checksheet."

VOLUME VI

EXHIBIT 1(J): Declaration of Gerald Armstrong in Opposition to Motions for Summary Adjudication Fourth, Sixth and Eleventh Causes of Action of Second Amended Complaint, Authenticating Exhibits.

EXHIBIT 1(J)(A): "Operating Thetan Section III," by L. Ron Hubbard (Handwritten and Typed Versions).

EXHIBIT 1(J)(B): Excerpt, Dianetics and Scientology Technical Dictionary, Bridge Publications, 1982.

EXHIBIT 1(J)(C): Declaration of Michael Rinder executed October 27, 1994, and filed in Scientology v. Steven Fishman & Uwe Geertz, US District Court for the Central District of California

	No. 91-6426-HLH (Tx).
EXHIBIT 1(J)(D):	Declaration of Robert Vaughn Young executed December 14, 1994.
EXHIBIT 1(J)(E):	Declaration of Stacy Brooks Young executed December 14, 1994.
EXHIBIT 1(J)(F):	Excerpt, Webster's Third New International Dictionary of the English Language Unabridged, Merriam Webster, Inc, 1981.
EXHIBIT 1(J)(G):	"The Creed of the Church of Scientology" published in What is Scientology, Bridge Publications, 1992.
EXHIBIT 1(J)(H):	Excerpt, Revised Bylaws of Church of Scientology International, Amended April 10, 1994.
EXHIBIT 1(J)(I):	"Keeping Scientology Working," Scientology Policy Letter by L. Ron Hubbard dated 7 February, 1965, Reissued October 12, 1985.
EXHIBIT 1(J)(J):	Declaration of Gerald Armstrong, executed July 19, 1991.
EXHIBIT 1(J)(K):	Letter from Gerald Armstrong to Eric Lieberman, dated June 21, 1991.
EXHIBIT 1(J)(L):	Order of Judge Diane Wayne filed July 28, 1994 in Scientology v. Armstrong, LASC No. BC 052395 (now Marin SC No. 157680).
EXHIBIT 1(J)(M):	"Why Thetans Mock Up," Scientology

Bulletin by L. Ron Hubbard dated October 1, 1969.

EXHIBIT 1(J)(N): Excerpt, article "5 Who Share the Legacy of Rev. King," San Francisco Chronicle, January 16, 1995.

VOLUME VII

EXHIBIT 1(K): Declaration of Garry L. Scarff, executed February 11, 1993 and filed herein in opposition to order to show cause re contempt.

EXHIBIT 1(L): Scientology publication entitled ""FACTNet" - Perversions, Criminality and Lies."

EXHIBIT 1(M): Scientology publication entitled ""FACTNet" Still Off the Rails."

EXHIBIT 1(N): Letter from Michael Rinder, Church of Scientology International executive and director of plaintiff herein, to Mirror Group Newspapers in London, United Kingdom dated May 9, 1994.

EXHIBIT 1(O): Set of Bates-stamped Scientology publications, known as "dead agent documents" concerning Gerald Armstrong and Judge Paul G. Breckenridge, Jr., produced by Scientology herein, and authenticated by Scientology representative Lynn R. Farny.

EXHIBIT 1(P): Declaration of David Miscavige, executed February 8, 1994 and filed in Scientology v. Steven Fishman, supra.

EXHIBIT 1(Q): Article "Catch a Rising Star," by John H. Richardson in Premiere, September, 1993.

EXHIBIT 1(R): Letter from Gerald Armstrong to Lawrence Wollersheim dated January 21, 1994 resigning as director.

EXHIBIT 1(S): Ex parte application to continue hearing on motions for summary adjudication and declaration thereto executed April 7, 1995, and denied by Judge Gary W. Thomas.

EXHIBIT 1(T): Scientology press release from Nancy O'Meara and Andrew H. Wilson regarding January 27, 1995 ruling by Judge Gary W. Thomas granting summary adjudication.

EXHIBIT 1(U): Letter from Church of Scientology International President Heber Jentzsch to E! Television dated August 5, 1993.

EXHIBIT 1(V): Letter from Ford Greene to Laurie Bartilson dated February 19, 1992.

EXHIBIT 1(W): Letter from Ford Greene to Laurie Bartilson dated February 24, 1992.

EXHIBIT 1(X): Letter from Laurie Bartilson to Ford Greene dated March 2, 1992.

EXHIBIT 1(Y): Partial transcript of proceedings, December 23, 1991, in Scientology v. Armstrong, Los Angeles Superior Court No. C 420153.

EXHIBIT 1(Z): Excerpts from transcript of deposition of Michael Douglas, taken herein August 30 and September 2, 1994.

EXHIBIT 1(AA): Excerpts from transcript of deposition of Nancy Rodes, taken herein August 30, 1994, and "mutual release agreement" executed December 5, 1986.

EXHIBIT 1(BB): Declaration of Kenneth D. Long in support of plaintiff's reply in support of motion for summary adjudication of the fourth, sixth and eleventh causes of action of plaintiff's second amended complaint, filed herein January 20 1995.

EXHIBIT 1(CC): Revised By-Laws of Church of Scientology International.

VOLUME VIII

EXHIBIT 2: Declaration of Hana Whitfield in Opposition to Motions for Summary Adjudication of 20th Cause of Action; and 13th, 16th, 17th & 19th Causes of Action of Second Amended Complaint, and Authenticating Exhibits, executed April 6, 1995.

EXHIBIT 2(A): Declaration of Hana Whitfield executed March 8, 1994, and filed in Fishman, supra.

EXHIBIT 2(B): "Routine 3 Heaven" Scientology Bulletin by L. Ron Hubbard dated May 11, 1963.

EXHIBIT 2(C): "Resistive Cases Former Therapy" Scientology Bulletin by L. Ron Hubbard dated September 23, 1968.

EXHIBIT 3: Declaration of Dennis Erlich in Opposition to Motions for Summary Adjudication of 20th Cause of Action; and 13th, 16th, 17th & 19th Causes of Action of Second Amended Complaint, and Authenticating Exhibits, executed April 6, 1995.

EXHIBIT 3(A): "Routine 3 Heaven" Scientology Bulletin by L. Ron Hubbard dated May 11, 1963.

EXHIBIT 3(B): "Resistive Cases Former Therapy" Scientology Bulletin by L. Ron Hubbard dated September 23, 1968.

EXHIBIT 4: Declaration of Margery Wakefield in Opposition to

Motions for Summary Adjudication of 20th Cause of Action; and 13th, 16th, 17th & 19th Causes of Action of Second Amended Complaint, and Authenticating Exhibits, executed April 7, 1995.

EXHIBIT 4(A): Paper, "What Christians Need to Know About Scientology" by Margery Wakefield.

EXHIBIT 4(B): Scientology's Motion for Order to Show Cause Why Plaintiff Should Not Be Held in Criminal Contempt, filed February, 1993 in Wakefield v. Scientology, US District Court for the Middle District of Florida, Case no. 82-1313-Civ-T-10

EXHIBIT 5: Declaration of Keith Scott in Opposition to Motions for Summary Adjudication of 20th Cause of Action; and 13th, 16th, 17th & 19th Causes of Action of Second Amended Complaint, executed April 5, 1995.

EXHIBIT 5(A): "Routine 3 Heaven" Scientology Bulletin by L. Ron Hubbard dated May 11, 1963.

EXHIBIT 5(B): "Resistive Cases Former Therapy" Scientology Bulletin by L. Ron Hubbard dated September 23, 1968.

EXHIBIT 6: Declaration of Malcolm Nothling in Opposition to Motions for Summary Adjudication of 20th Cause of Action; and 13th, 16th, 17th & 19th Causes of Action of Second Amended Complaint, and Authenticating Exhibits, executed April 2, 1995.

EXHIBIT 6(A): Affidavit of Malcolm Claude Nothling executed November 11, 1992.

EXHIBIT 6(B): "Creed" of Church of Scientology.

EXHIBIT 7: Declaration of Jonathan Atack in Opposition to Motions for Summary Adjudication of 20th Cause of Action; and 13th, 16th, 17th & 19th Causes of Action of Second Amended Complaint, and Authenticating Exhibits, executed April 9, 1995.

EXHIBIT 7(A): Booklet "Total Freedom Trap: Scientology, Dianetics and L. Ron Hubbard, by Jon Atack, Theta Communications, Ltd., 1992.

EXHIBIT 7(B): Scientology Booklet "Anatomy of a Propagandist" Theta Communications International, undated.

EXHIBIT 8: Declaration of Nancy McLean in Opposition to Motions for Summary Adjudication of 20th Cause of Action; and 13th, 16th, 17th & 19th Causes of Action of Second Amended Complaint, and Authenticating Exhibits, executed April 5, 1995.

EXHIBIT 8(A): Opinion of Eleventh Circuit Court of Appeals in *McLean v. Scientology*, Case no. 89-3505, dated September 17, 1991

VOLUME IX

EXHIBIT 9: Declaration of Lawrence Wollersheim in Opposition to Motions for Summary Adjudication of 20th Cause of Action; and 13th, 16th, 17th & 19th Causes of Action of Second Amended Complaint, and Authenticating Exhibits, executed April 7, 1995. (Original was filed herein April 10, 1995)

EXHIBIT 9(A): Publication "FACTNet's Mission," by FACTNet, Inc. (Fight Against Corecive Tactics, Network, Incorporated).

EXHIBIT 9(B): FACTNet Research Publication "Scientology's Policies Toward Its Adversaries."

EXHIBIT 10: Second Declaration of Gerald Armstrong in Opposition to Motion for Summary Adjudication of 13th, 16th, 17th & 19th Causes of Action of Second Amended Complaint, executed September 9, 1995.

EXHIBIT 10(A): Videotape taken by Eugene Ingram of Gerald Armstrong at November, 1992 Cult Awareness

Convention, produced by Scientology herein (lodged separately).

DATED: September 15, 1995

Respectfully Submitted,

Gerald Armstrong

ORIGINAL

5894

Gerald Armstrong
715 Sir Francis Drake Boulevard
San Anselmo, CA 94960
(415)456-8450
In Propria Persona

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF MARIN

CHURCH OF SCIENTOLOGY INTERNATIONAL, a California not-for-profit religious corporation, Plaintiff, vs. GERALD ARMSTRONG; MICHAEL WALTON; THE GERALD ARMSTRONG CORPORATION a California for-profit corporation; DOES 1 through 100, inclusive, Defendants.	No. **157 680** **DECLARATION OF GERALD ARMSTRONG IN OPPOSITION TO MOTIONS FOR SUMMARY ADJUDICATION OF 20TH CAUSE OF ACTION; AND 13TH, 16TH, 17TH & 19TH CAUSES OF ACTION OF SECOND AMENDED COMPLAINT** Date: 9/29/95/95 Time: 9:00 a.m. Dept: One Trial Date: Not Set

DECLARATION OF GERALD ARMSTRONG

I, Gerald Armstrong, declare:

1. I have personal knowledge of the facts set forth in this declaration and could competently testify thereto if called as a witness.

2. I am a Christian.

3. My life, in every moment and breath, is God's and in His Hands. I have been saved from eternal separation and hell to become a son of God by His Grace alone, and drawn by Him to trust and follow His Son Jesus Christ as my Lord and Savior. I have been filled with God's Holy Spirit, and given by Him all peace, wisdom and love. I have been saved for God's Purposes to His

Glory. I believe that His Purpose for me and all the world is salvation. I believe that the only difference of any meaning at any time between me and anyone else on this earth is this belief in God's Plan for salvation.

4. As a Christian and as a son of God I have been led and will be led into all of my life's situations and to all of the people I have encountered and will encounter for His Purposes alone. I believe that from God come all things, including the trust in Him, the willingness to believe on Him, free will, peace, wisdom and love.

5. I was raised as a "Christian" in the Anglican Church in Chilliwack, B.C., Canada, and I retained some of the Christian learning of my youth through my Scientology years. I was in Scientology from the age of 22 to the age of 35. When I first got into Scientology it professed, as it does with every new person, to be completely compatible with Christianity. It claimed to be a science, and its promises "demonstrably true." It claimed that it and its promises were the product of the scientific research of L. Ron Hubbard, Scientology's founder and leader, who also claimed to be an engineer and a nuclear physicist. Hubbard claimed that his techniques, procedures, end results and products had been subjected to the "rigors of the scientific method." Scientology also claimed to be "religion in the oldest meaning of the word," and "pan-denominational," accepting people of all religions and beliefs, but itself not requiring belief to deliver on its promises. In those days Scientology published a booklet called "Scientology and the Bible," in which Biblical quotations were compared as similar in meaning to quotations from Hubbard's works.

6. Throughout my Scientology years I put my faith in

Hubbard, and in his philosophy, mental "science" and organizational policies. Through God's Grace and Wisdom I came to see that this was a misplaced faith. I came to see that despite that misplaced faith, God never deserted me, that He was with me and keeping me safe every moment, just as He is now. Throughout my Scientology years, through abuse, danger, and betrayal, He kept my heart from being hardened beyond salvation.

7. God kept me from being completely taken over by Scientology through all the years of indoctrination, mind control, "ethics," threat and punishment; and through the more than a thousand hours of mental processing, what Scientology calls "auditing." When Hubbard assigned me twice to the Rehabilitation Project Force (RPF), Scientology's prison, for a total of twenty-five months, when he had his messengers order my wife Terri to leave me, when I was ordered security checked for questioning Hubbard's truthfulness, God brought me through safely, made me stronger and wiser, and kept my heart from hardening. I now know that I was so deeply involved with Scientology, so devoted to an ungodly man and his ungodly teaching, only God's Own leading me, through His mysterious way, could have saved me. He led me into the Hubbard archive and biography project, brought me to study the man's secret papers and document his duplicity, and freed my faith from Scientology, on which it had been misplaced.

8. I now see that Scientology is the clever human invention of a clever human who took his human cleverness as far as it would go for his own glorification. I believe that God used me, an unsaved man, an uneducated, unrefined and very imperfect vessel, to accomplish part of His Plan for Scientology, Scientologists and salvation. I can see how it took someone with a God-given

history, character and skills such as He gave me to bring out of Scientology, to the light, and to the minds and hearts of all those whom God sent to listen, a testimony of the character of Scientology's product and "source." I believe that God continues to use me to reflect the unworthiness and bankruptcy of Hubbard's attempt to create his own salvation plan, against the infallibility and peaceful grandeur of God's Plan.

9. In my post-Scientology period, when first in the outside world, confused and afraid, God took me in His Hands for particular care and teaching. When Scientology's leaders sent hired private investigators to spy on me and my wife, and essentially to terrorize us, God kept me, in spite of my fear and desperation, emotionally intact. God used Scientology's "Suppressive Person Declares," which, when I heard of and read gave me the shakes, to make me stronger and to bring the ungodly practice of "declaring" people, and targeting them as "fair game," to light. He allowed Scientology to sue me so that its abuse of His children, the pathology of its "religious leader," and the baseness of its "theology" would be brought to light through my 1984 trial and the resulting "Breckenridge decision." When Scientology's leaders still resisted God's chastening, He caused the 1991 published opinion Scientology v. Gerald Armstrong, 283 Cal.Rptr. 917.

10. At the first hearing in my case in 1982, God somehow put into my hands a tiny tract of Bible quotes which I held and put my heart on as fear gripped at me. I've lost it since; it was about two inches square, and yellow colored, my first post-Scientology reach for God's Word. Throughout the 1984 trial, where I was on the stand for about ten days, I depended on the Twenty-third Psalm

to calm my mind and heart. Between questions, over and over, "The Lord is my shepherd; I shall not want....Yea, though I walk through the valley of the shadow of death, I will fear no evil: for Thou art with me..."

11. God allowed Scientology's leaders to "cull" my "preclear folders." They took out of my supposedly confidential counseling files embarrassing or unsavory incidents from my past, and then divulged them in court and elsewhere, so that light would be shone on this terrible practice. God allowed these leaders to disseminate invented disgraceful incidents, as if I had "confessed" them during "auditing." God allowed me to humiliated and my heart to be broken over and over by the cruel acts directed by Scientology's leaders.

12. God allowed me to be terrorized, my car broken into, my drawings and writings to be stolen, other writings and ideas of mine perverted and held up to ridicule. He allowed Scientology's leaders to become intoxicated by their own lies so that they would try time after time to have me jailed on their false and manufactured criminal charges. He allowed their self-deception, so that they concocted a perverse intelligence scheme to entrap me in a crime and have me prosecuted. He allowed Scientology's leaders to put their faith in a base private investigator, Eugene Ingram, whom they would use to illegally videotape me, and who threatened to put a bullet between my eyes. God allowed the heart of an Los Angeles Police Department Officer, Philip Rodriguez, to be tempted by greed, and paid for a false authorization to Scientology to illegally videotape me. He allowed my friend Dan Sherman to use our friendship to betray me, to lead me with kind words into danger, to set me up, to trick from me my thoughts and

writings, and to break my heart.

13. God allowed my own judgment to be clouded so that I would continue to walk unheeding into Scientology's intelligence scheme. In my childhood He gave me a desire to help the needy and the oppressed. He let Scientology's leaders divine and fix upon this God-given desire, and then manipulate the desire for their own purposes. It was during this period, when I sensed that I indeed might be walking into a trap, that I sensed God's close Presence, began to understand guidance, hoped and believed that I was being guided, and chose in the face of danger to keep going forward into whatever God unfolded. He allowed me to curse and to say things in ignorance or anger while being secretly recorded and videotaped, so that Scientology's leaders would be deluded into thinking these words would destroy me. In their delusion and rush to expose and destroy me, their trap, criminality and malevolent purposes were themselves exposed. Asking nothing more than my small willingness to go forward in faith, God brought me safely, albeit shamed and shaken, through all of Scientology's schemes, snares and temptations.

14. God allowed Scientology's leaders to also attack my attorney Michael Flynn, my good friend, benefactor and champion in the legal battle. God allowed Scientology to sue him some fifteen times, to threaten him, his family and career, to frame him with forgery, to pay known criminals to bear false witness against him, and, according to him, to attempt his assassination. God allowed Scientology's leaders to think they could destroy Flynn with their "black propaganda," "dead agent" packs, "noisy investigations," and the compromise and turning of other clients. Scientology worked for seven years to achieve this destruction. God brought

me to Flynn, and him to me, and brought us to fight alongside each other in a legal and spiritual battle against the threat and evil of Hubbard and his organization from 1982 through 1986. In 1985 through 1986 I worked in his office in Boston. I depended on Flynn in those days. I loved him as if he were a big brother, and I tried in my role and capacity to help him and support him as a younger brother should.

15. I lived my own life as well, away from the Scientology battle, during those years, being brought ever closer to God. When I was alone, at times in terrible fear, He kept me safe, and allowed my heart to break, over and over. I believe He spoke to me, and that at times, as early as 1983, I wrote His Words to me under His guidance in what seemed to be dialogues. He gave me the idea for the true protection of His Children in this world, and moved me in 1986 to found a church, based on this concept. The Church, which is free to everyone, including Scientologists, has a belief, a corollary, and the obvious. The belief, out of Jesus's teachings (See, e.g. Matthew 18:20) is that when members of the Church are together, God is present. The corollary is that whatever is said or done when members of the Church are together is sacred. The obvious is that it is always thus. Scientology's lawyers attack my Church but it remains and lives under God's Will for His Glory.

16. With Scientology facing tremendous exposure and liability in my cross-complaint for years of outrageous fair game attacks, and having just suffered a $30,000,000 verdict in the case of Lawrence Wollersheim v. Scientology, Los Angeles Superior Court No. C 332027, God, almost incomprehensibly, then allowed Flynn to lose heart. Flynn "negotiated" a deal with Scientology

which involved getting his clients to agree to the organization's demanded contractual condition of silence about their "experiences," while not demanding the same protection for his clients. Many of these clients had been the target of Scientology's "black propaganda" campaigns. He also agreed to get his clients to agree to a "liquidated damages" penalty of $50,000 per comment about their experiences. Flynn did this while believing, and having ample experience to justify believing, that the settlement agreements were evil, as was the entity which was insisting on the "agreements" being signed as a condition of settlement. Flynn knew Scientology's word was not to be trusted, yet he conveyed and gave support to Scientology's "promise" that it was going to discontinue fair game.

17. God allowed Scientology to harass, threaten and compromise Flynn, and allowed Flynn to be persecuted and compromised, for His Purpose to His Own Glory. After flying me from Boston to Los Angeles in December, 1986, Flynn presented the settlement documents to me for the first time. Upon reading the conditions in the "agreement," I was, as I've stated many times since, heartsick. I protested that it was impossible to live by Scientology's conditions, and that the "liquidated damages" penalty of $50,000 each time I might speak to anyone about my then seventeen years of experiences, was madness. And then God allowed Flynn to say the words, from his fear and desperation, but ultimately from truth, "Gerry, it's not worth the paper it's printed on. It's unenforceable. You can't contract away your Constitutional rights." God allowed Flynn to point out to me my release of Scientology and my dismissal of my lawsuit, and allowed him to say, "That's what they're paying you for."

18. Flynn conveyed to me a picture of all who depended on me to sign the evil documents to get them "free" from Scientology's threat. He said that Scientology had promised to cease all "fair game" actions, to cease the attacks on all the settling individuals, and on every one else. He said that Scientology wanted the opportunity, which, he said, the settlement would give them, to prove that they had turned over a new leaf, and had ceased fair game. He said that he had to get out of the fight, that he had done enough, that he had paid his dues, that Scientology had ruined his marriage, his wife's health and his life. He said that if I didn't sign all I would get would be more of the same attacks, threat and misery. He said that I had to get on with my life, that I too had to get out of the litigation, get away from Scientology's threat, and that everyone had to get out of it, out of the madness of this battle with evil.

19. God made me aware of His Spirit at that moment, when I was alone, rejected from Mike Flynn's heart, and yelled at by another "client" as a "deal breaker," simply for caring. God showed me a glimpse of the future at that moment; that I might be left alone, that I might be persecuted, but that I should not fear; and that I should at that time give everyone involved what they wanted, what they thought they needed to be free. So, because of Flynn's promise of the agreement's unenforceability, my desire to end the threat if possible for everyone, Scientology's promise to end fair game, and God's Assurance, I did sign.

20. After the "settlement," God gave me a time of some quiet and joy to write, draw, get strong after years of deteriorating health, to hang out with friends, and to be drawn ever closer to Him. In 1987 He chose me and came to me in the undeniable

Physical Substance of His Love, and gave me a greater view of my future role in His Plan. In 1988 He brought me to offer my life in exchange for the captives then held in Lebanon. He schooled me in the understanding of His Nature and set me on the path to become by 1989 one of His Teachers. Also in 1989 He gave me an understanding of the valuelessness of money, and a glimpse of His solution for the grinding cruelty of the world's economic system. He brought to me a glory of four-leaf clovers. He showed me that through my life He could bring to the world the mathematical proof of His guidance. He moved me to run like the wind, and to pick up the world's trash, all for His Glory.

21. During the post-settlement years, God also allowed the hearts of Scientology's leaders to grow ever harder and to manifest in attack after attack on my character and credibility. It became clear, and saddened me greatly, that these leaders had not stopped "fair game," but were using the cessation of the litigation by Flynn and his clients as an opportunity to continue their antisocial practices unchecked. They published their own false versions of my history, delivered their "black propaganda" packs on me to the press, which included documents Scientology itself had insisted be sealed in my case and in other cases. They used Gene Ingram in their attacks, disseminating to the press an edited version of his illegal videotape, which had also been sealed in my case. They filed false affidavits attacking me in civil cases and in their litigation with the IRS. Scientology's lawyers threatened through Mike Flynn, that if I responded to the attacks, or even talked to any of the opposing attorneys in a case in which Scientology filed its false affidavits about me, they would consider my talking a breach of the "agreement," and would

sue me.

22. God allowed my heart to be broken by each attack and the daily knowledge that Scientology had not ceased fair game, yet He kept me from responding with anything other than sadness for almost three years. Then, in the fall of 1989, I was served with a deposition subpoena by the attorney for Bent Corydon in the case of Corydon v. Scientology, Los Angeles Superior Court No. C694401. Following this I received a series of calls from Scientology attorney Lawrence Heller who threatened that, even pursuant to Corydon's subpoena, if I testified about my knowledge of Hubbard and Scientology I would be sued. I was deeply troubled by Heller's threats, the idea of succumbing to those threats, and the injustice and evil the settlement agreements had spawned. God brought me at that time to a determination to do what I could to bring to light and correct that injustice and evil. When I began to research my rights, responsibilities and how to proceed, I learned that through the intervening five years Scientology had been able to maintain an appeal, Scientology v. Armstrong, No. B025920, from the 1984 Breckenridge decision, and my first actions concerned that appeal.

23. Much of my history and legal involvement with Scientology from that point is told in the declarations and other documents appended hereto. Exhibit A is a true and correct copy of a declaration I executed March 15, 1990 and filed in the B025920 appeal and a consolidated appeal, No. B038975, along with true and correct copies of certain exhibits which were appended to the original declaration.

24. Exhibit B hereto is a true and correct copy of a declaration I executed December 25, 1990 and filed in

Scientology's appeals, along with true and correct copies of certain exhibits which were appended to the original declaration.

25. Exhibit C hereto is a true and correct copy a Court of Appeal published opinion affirming the Breckenridge decision. Scientology v. Armstrong, 283 Cal. Rptr. 917 (Cal. Ap. 2nd Dist. 1991). Exhibit D hereto is a true and correct copy of Scientology's motion to seal record on appeal in Appeal Nos. B025920 and B038975, supporting declaration. Exhibit E hereto is a true and correct copy of my opposition to the motion to seal record on appeal, supporting declaration, and exhibits thereto. Exhibit F hereto is a true and correct copy ofrder of the Court of Appeal dated December 5, 1991 denying the motion to seal record.

26. Exhibit G hereto is a true and correct copy of a declaration I executed March 16, 1992 and filed in the instant case (which then had Marin Superior Court No. 152229), along with true and correct copies of certain exhibits which were appended to the original declaration.

27. Exhibit H hereto is a true and correct copy of a declaration and literary work, entitled "I Declare," I executed January 13, 1994, along with certain exhibits thereto. I wrote "I Declare" for filing in a lawsuit Scientology brought against me in 1993, in which it charged that my giving away my worldly assets and forgiving debts owed me in 1990 were "fraudulent conveyances." The organization asserts that my renunciation was to avoid the claims it raised in another lawsuit it brought in 1992 for liquidated damages stemming from what it alleges are breaches by me in 1991 of its 1986 settlement agreement. My renunciation had nothing to do with Scientology, but was the result of my asking God in prayer for guidance at the time of, and precipitated by,

the Middle East crisis which built into Desert Storm, and the trouble I felt about the world situation, the general state of mankind, and what God wanted me to do.

28. The answer, which I truly believe is God's, was to give my things away, take only what I needed, and then, under His guidance, to go wherever my help was asked for. That is what I did and how I have tried to live my life ever since. My life has been forever changed from that decision and from following that guidance. I had no idea where I would be led or what I would do, other than to try to discern and do God's Will. I know I have not always discerned correctly, and I know that I still have an old willful nature. I also know that God has drawn me steadily, through joyful times, and through difficult, threatening and tearful times, closer and closer to Him, and that He has given me a new nature which is Christ's.

29. As God would have it, some of the people who were led to me and asked for my help following my 1990 decision to go where He led me were those who had been fair game's victims in the post-global settlement period. In June, 1991, a South African man, Malcolm Nothling, who had been defamed and defrauded by the organization, called for my help. In July, 1991, Joseph Yanny, a former attorney for Scientology, who had become its fair game target and was attempting to assist other Scientology victims, Richard and Vicki Aznaran, asked me to help. In the Aznaran's case, the effect of the settlement agreements on their ability to obtain counsel and on their ability to oppose Scientology's efforts to deny them due process became relevant. In August, 1991, God led me to Ford Greene, one of the few surviving attorneys willing to take cases on behalf of Scientology's

victims. Ford also asked for my help. All of this history is covered in detail in "I Declare."

30. Seizing on my responses to the requests for help from people God had sent to me, Scientology's leaders have, since 1991, carried out a withering litigation campaign to silence and destroy me through judicial enforcement of the settlement agreement. Throughout the litigation and until recently I was defended by Ford Greene, for whom I, also until recently, worked as his sole office assistant, and who became through the years my good friend. Scientology first brought a motion to enforce in the original case, Scientology v. Armstrong, Los Angeles Superior Court No. C 420153, which was denied. They then filed a lawsuit for breach of contract, Scientology v. Armstrong, Marin Superior Court No. 152229, which was transferred to Los Angeles Superior Court and given number BC 052395. They obtained a partial injunction in that case in May, 1992, which I appealed. The appeal, Scientology v. Armstrong, Cal. Ap. 2nd Dist. No. B 069450, stayed proceedings in BC 052395 from March, 1993 through May, 1994. During the stay Scientology filed two more lawsuits against me, Los Angeles Superior Court No. BC 084642, and Marin Superior Court No. 157680, the "fraudulent conveyance" action for which I wrote "I Declare." Scientology also tried repeatedly to have me found in contempt of court and jailed for alleged violations of the partial injunction, some of which "violations" Scientology's own personnel manufactured. This period was threatening and difficult, but I was buoyed by the hope that some court would see through Scientology's lies and attacks, and a certainty was developing in me that God's Will in His good time would triumph.

31. What I saw and see as an unconscionable unfairness has

perplexed me throughout this litigation. Scientology claims that by the "agreement" they can say whatever they want about me, and that I cannot respond in any way. Such a concept is un-American and patently unfair. If I had known that this is the meaning of the settlement agreement, and that any court could possibly consider that this is its meaning; that Scientology is free to attack me or anyone else, that it was going to be fair game as usual, but without my being legally able to respond or defend myself or anyone else, I would never, for all the money in the world, have signed that terrible document. The whole set of "settlement agreements," which are commonly known as the "Flynn agreements," are unfair to anyone who litigates either as a defendant or plaintiff against Scientology, since these agreements remove knowledgeable witnesses from the legal arena and drive up litigation costs. The "agreements" are also unfair to the public because they allow Scientology's leaders to rewrite history, lie about judicially credited information, attack the sources of that information without response, and convey the idea that it is futile to speak the truth or oppose their tyranny. These "agreements" obstruct justice. There is also a tragic unfairness worked on all those people trapped inside Scientology and abused by the organization because the agreements abet the denial of accurate information to those Scientologists and convey a sense of hopelessness to any who might begin to break free and might be contemplating seeking redress for that abuse. These unfairnesses have been a major factor in my continuing in the litigation, despite the threat and difficulty, in the hope that some court will adjudge the agreements illegal. If such unfairnesses are ultimately ruled fair, it will be unfair to anyone who looks to our justice system for justice; and the justice system will become fair game to those who seek injustice.

32. There is another unfairness crafted by Scientology's lawyers in connection with the attacks on me which is particularly troubling. Throughout the litigation I have written and spoken to Mike Flynn dozens of times asking him to come forward and provide a declaration concerning the circumstances at the time of the settlement, the duress Scientology subjected him to, the duress his other clients were subjected to, the picture of this duress that he conveyed to me, and Scientology's promise to cease fair game. I have asked him dozens of times to confirm in a declaration the representations he made to me about the unenforceability of the liquidated damages penalty, that it was "not worth the paper it's printed on," that my release of Scientology was only to the date of the signing of the agreement, that my responses to its post-settlement attacks were not breaches of the agreement, and that Scientology obtained his willingness to have his clients and himself sign the "agreements" by fraud, as evidenced by the fact that fair game continued as before. Flynn has said throughout this litigation, however, that he signed an agreement like the one he had me sign, and he is afraid that Scientology will sue him, as it has me, and again make his life hell if he helps me. Ford requested Scientology to release Flynn, as a percipient witness, from the "contract" by which they prevent his assisting me, but Scientology has refused. Flynn continues to say that the agreement is evil, and the Scientology organization is evil, but that the courts of this country cannot deal with Scientology. He says that although he is saddened by my plight and wants to help me in my case he cannot and will not. This

unwillingness by Flynn to come forward and tell the truth, which, if he did, I believe would bring any judge on the case to rule the settlement agreement illegal and end the litigation, has many times through these years greatly disheartened me. Nevertheless, I now see that even this aspect of this spiritual war is in God's Hands and He is using it to His Glory.

33. Since the beginning of 1994 when I wrote "I Declare," Scientology has continued without relent to press its litigation assault on me. On May 16, 1994, the Court of Appeal denied my appeal, ruling that the partial injunction was not an abuse of the Judge's discretion, and declining to address the legality or illegality of the underlying settlement contract. On July 28, 1994, after an evidentiary hearing, Los Angeles Superior Court Judge Diane Wayne dismissed all of the contempt charges against me. In August, 1994, Ford brought a summary adjudication motion on my behalf in the fraudulent conveyance action, based in part on a religious defense, since the idea of conveying my worldly assets was God's answer to my prayer to Him, and the acts which flowed from that idea were, although unrelated to Scientology, religiously motivated. Exhibit I is a true and correct copy of a declaration I executed August 12, 1994 and filed in support of this summary adjudication motion, along with true and correct copies of certain exhibits which were appended to the original declaration. Judge Thomas, in denying my motion ruled that "the religious beliefs of the parties are irrelevant in determining the issues in this action."

34. In the fall of 1994, the three cases Scientology had pending against me were, on the organization's request, consolidated in Marin County and given one number, 157680.

Scientology brought a motion seeking summary adjudication of three causes of action, two for providing declarations in cases against the organization, and one for talking to the media. Ford filed an opposition to the motion based on the organization's subjecting me to duress through Mike Flynn to get me to sign its settlement agreement, the invalidity of the liquidated damages provision, and on the "absolute" litigant's privilege. On January 27, 1995 Judge Thomas granted summary adjudication as to two of the three causes of action, ruling, among other things and amazingly, that I had "fail[ed] to raise a triable issue as to whether the liquidated damaged provision is invalid," and that I had "not raised a triable issue regarding duress."

35. In early January, for reasons known to us and God, my attorney and friend Ford Greene also lost heart. It had been coming to me through the years that this litigation, although set in a context of secular laws and courts, really concerned deep religious issues. After Ford filed our opposition to Scientology's summary adjudication motion, therefore, I prepared and filed, unfortunately six days late, a declaration and exhibits which addressed the religious issues as I then saw them. A true and correct copy of this declaration and the exhibits thereto are appended hereto as Exhibit J. Judge Thomas struck my declaration for late filing and assessed $700.00 in sanctions against me.

36. On February 23 Ford substituted out of my case.

37. On February 27 I received Scientology's motion for summary adjudication of its twentieth cause of action. Scientology seeks by this motion a permanent injunction, which would be much broader than the preliminary injunction now in place, and which would prohibit me from, inter alia, "discussing

with anyone, not a member of [my] immediate family or [my] attorney, Scientology, the Church [etc.];" "acquiring ... any ... writings, recordings, documents, or books of any kind, which discuss or concern Scientology, the Church [etc.];" and would require that I "[r]emove all information concerning Scientology, the Church [etc.]... within the possession, custody or control of FACTNet;" and "[r]eturn to the Church any documents [I] now [have]... which discuss or concern Scientology, the Church [etc.], other than documents which have been filed in this litigation."

38. On March 10 I applied for an extension of two weeks to be able to oppose this motion which Judge Thomas granted. On March 17 Scientology served on me another motion for summary adjudication of four causes of action: No. 13, for giving a videotaped interview concerning my Scientology experiences; No. 16, for talking to a Newsweek reporter about Scientology's efforts to get its materials into the public school system; No. 17, for an interview on E! Television; and, No. 19, for providing declarations which discuss my Scientology experiences for filing in the case of Scientology v. Steven Fishman, et al., U.S. District Court for the Central District of California, Case No. 91-6426 HLH (Tx).

39. Because I had been ill, lacked the necessary equipment and funds, lacked real attorney knowledge and skills, and was utterly unable to prepare the oppositions, on March 29 I again applied to Judge Thomas for more time. He gave me one week. On April 7, facing the same situation and problems, I again applied for more time, and also requested an order that Scientology free Mike Flynn from the contract which prevented him from providing me a declaration regarding the circumstances at the time of the

global settlement, and Judge Thomas denied my application. I was unable to complete my oppositions, even within the time I requested, I am now late, and at the mercy of the Court and Scientology. Nevertheless, I proceed.

40. Appended hereto as Exhibit K through DD are true and correct copies of the following documents:

K. Declaration of Garry L. Scarff, executed February 11, 1993 and filed herein in opposition to order to show cause re contempt;

L. Scientology publication entitled ""FACTNet" - Perversions, Criminality and Lies;"

M. Scientology publication entitled ""FACTNet" Still Off the Rails;"

N. Letter from Michael Rinder, Church of Scientology International executive and director of plaintiff herein, to Mirror Group Newspapers in London, United Kingdom;

O. Set of Bates-stamped Scientology publications, known as "dead agent documents" concerning Gerald Armstrong and Judge Paul G. Breckenridge, Jr., produced by Scientology herein, and authenticated by Scientology representative Lynn R. Farny;

P. Declaration of David Miscavige, executed February 8, 1994 and filed in Scientology v. Steven Fishman, supra;

Q. Article "Catch a Rising Star," by John H. Richardson in Premiere, September, 1993;

R. Letter from Gerald Armstrong to Lawrence Wollersheim dated January 21, 1994 resigning as director;

S. Ex parte application to continue hearing on motions for summary adjudication and declaration thereto executed April 7, 1995, and denied by Judge Gary W. Thomas;

T. Scientology press release from Nancy O'Meara and Andrew H. Wilson regarding January 27, 1995 ruling by Judge Gary W. Thomas granting summary adjudication;

U. Letter from Church of Scientology International President Heber Jentzsch to E! Television dated August 5, 1993;

V. Letter from Ford Greene to Laurie Bartilson dated February 19, 1992;

W. Letter from Ford Greene to Laurie Bartilson dated February 24, 1992;

X. Letter from Laurie Bartilson to Ford Greene dated March 2, 1992;

Y. Partial transcript of proceedings, December 23, 1991, in Scientology v. Armstrong, Los Angeles Superior Court No. C 420153;

Z. Excerpts from transcript of deposition of Michael Douglas, taken herein (case no. on face page is incorrect) August 30 and September 2, 1994;

AA. Excerpts from transcript of deposition of Nancy Rodes, taken herein August 30, 1994, and "mutual release agreement" executed December 5, 1986;

BB. Declaration of Kenneth D. Long in support of plaintiff's reply in support of motion for summary adjudication of the fourth, sixth and eleventh causes of action of plaintiff's second amended complaint, filed herein January 20 1995;

CC. Revised By-Laws of Church of Scientology International.

41. In its motions, Scientology labels Vaughn and Stacy Young, Hana Whitfield and Lawrence Wollersheim "anti-Scientologists." They are not anti-Scientologists, but are pro-Scientologist. What they are "anti-" is the leaders of Scientology ordering fair game attacks on them, and on anyone. They are opposed to Scientology's leaders' deceiving Scientologists and subjecting Scientologists to coercive and abusive practices to their detriment. Calling the Youngs, Ms. Whitfield and Mr. Wollersheim "anti-Scientologists" is Scientology's leaders' "black propaganda," pursuant to their "fair game" philosophy.

42. Lawrence Wollersheim and I have been friends for over ten years. I know him to be a target of Scientology's fair game for many years, and someone who has been able to successfully stand up to its attacks, and stands up for others, such as myself, who are Scientology's fair game targets. In 1993 he asked me, in large part, I believe, because he also viewed me as both a victim of cult abuse and an advocate for other victims, to be on the board of directors of a cult victims advocacy organization he was forming, which eventually became known as FACTNet, Fight Against Coercive Techniques Network. FACTNet functions as a library and historical preservation archive, collecting, preserving and making available information on groups using dangerous mind control practices. When I agreed to be a director of FACTNet I was not intending to participate in its operations, and have not ever been

involved in its operations. I suggested that my role in FACTNet could be one of strategy, planning and consultation, but even whatever I did in that role was negligible. In January, 1994, Scientology threatened to sue FACTNet and some related groups and individuals because of their association with me. To remove or reduce this threat I resigned my position on FACTNet's board. I have had no official role or involvement in FACTNet since that time. I have no control of FACTNet, and the order that Scientology seeks in this case that I remove all the materials from FACTNet's library and archive which relate to Scientology is impossible. I am a FACTNet library card holder, like many others around the world. I have donated and sent materials to FACTNet for preservation purposes, as everyone with information on dangerous cults' coercive practices and antisocial activities may do. The bulk of what I sent FACTNet concerned Scientology's private investigator Eugene Ingram, his fair game efforts against me, and his effort in 1985 and 1986 to frame Mike Flynn with the forgery of a $2,000,000 check on an L. Ron Hubbard bank account. Ingram is not named as a beneficiary in the 1986 "settlement agreement." He has participated in Scientology's fair game attacks on me since at least 1984. In 1992 he spread the rumor at the national convention of the Cult Awareness Network ("CAN") that I had AIDs. He has also participated in Scientology's fair game attacks on Wollersheim, and many other people that Scientology's leaders target. Scientology describes the materials I sent to FACTNet as "anti-Scientology." They are not. They tell the truth about some of the Scientology organization's activities and criminal and antisocial practices. As a victim of cult abuse and as a present target of Scientology's fair game attacks, I use

FACTNet's services and facilities to support my defense in the legal arena and as a safeguard against Scientology's extra-legal attacks and threat. FACTNet has assisted me with research, fund-raising, getting my story told, and spiritual understanding.

43. In support of my opposition to Scientology's motions for summary adjudication several people, all of them my friends - Lawrence Wollersheim, Hana Whitfield, Dennis Erlich, Margery Wakefield, Keith Scott, Malcolm Nothling, Jonathan Atack and Nan McLean - have come forward and provided declarations. They did this at considerable risk to themselves. Ms. Wakefield and Ms. McLean signed Flynn agreements similar to mine in 1986, and Scientology has attacked them in court proceedings since then based on claimed violations of those agreements. Scientology has pending an effort to have Ms. Wakefield found in contempt of court and jailed for up to 22 years for daring to speak the truth about her experiences and knowledge. Scientology's recent fair game efforts to destroy the reputations of Ms. Whitfield, Mr. Wollersheim and Mr. Atack are shocking. Each one of these people has knowledge of fair game, and each continues to be its target to this day. My former attorney Ford Greene continues to be a fair game target. It is for all of these people and the thousands of others of good heart like them around the world who have become targets of Scientology's fair game doctrine that I speak, write and fight. One day that ungodly threat will be removed.

44. Around March 12 and continuing for about two weeks I experienced what I believe was both my spiritual death and my rebirth, brought on me by God. He showed me the nature of the evil that I had been chosen to oppose, and He showed me the spiritual battle with that evil. At times an oppressive evil came

to overwhelm me. I lost strength and acuity. For stretches of hours my heart ached and I prayed, as Jesus prayed, that if it were possible this cup be taken from me; nevertheless that God's Will be done. At times God came to me, spoke to me, and held me in His Strength and Love. He showed me that persecution must be endured for His Cause, and assured me that He would never leave me. He showed me that in this civilized country we carry out our crucifixions in courtrooms. He showed me the souls I fought for, and why He chose me to fight through all those years. My strength has not returned to normal, and I am forever altered. God brought me to surrender my battle to Him that His Will be done, for unless He does it I haven't got a prayer. I will run whatever race He calls me to run as fast and as far as He moves me. Sometimes He will appear to lose the race on earth to win it in Heaven.

45. Scientology is anti-Christian. To the uninitiated, it professes to be compatible with Christianity. It states in its "catechism," published in 1992 in its promotional book What is Scientology?,

> "Scientologists hold the Bible as a holy work and have no argument with the Christian belief that Jesus Christ was the Savior of Mankind and the Son of God...¶There are probably many types of redemption. That of Christ was to heaven."

In Scientology's actual teachings, however, in the policies and procedures which indoctrinated Scientologists must follow, Jesus Christ, Heaven, and Almighty God, are false ideas "implanted" in man by electronic gadgets to achieve, not man's redemption, but his enslavement. Scientology teaches, moreover, that its procedures, developed by L. Ron Hubbard, are the only way to free man from that "Christian" slavery.

46. The main target of Scientology's promotion and marketing are Christians, and by far the largest percentage of Scientology's members come from Christian backgrounds. Using Scientology's own figures from What is Scientology? this amounts to fifty-three percent of its members. The second largest percentage comes from Judaism, which worships the same God, Jehovah, as Christianity, the same God, Hubbard teaches is an "implant." But Scientology not only teaches that the God of Christianity and Judaism is an implant; Scientology enforces the acceptance of that teaching with its system of "ethics" punishments, its "auditing procedures," and its institutionalized mockery of God and Christ. Anyone in Scientology who professed a belief in Christ, or God, or who sought help through prayer, was viewed and handled as a "psychotic." Such a person was segregated, given special auditing to break his belief, and, if the "aberration" persisted, he would be "off-loaded." I learned very quickly inside Scientology to disavow any belief in God, to not mention Him, to not look to Him for wisdom or help, and to view Christians as "aberrated" and "dramatizing the Christ implant." I learned very quickly that inside Scientology even thinking of Christ or God as real was labelled as an "other practice," a punishable "ethics offense" or "overt," which would become the subject of a "security check" on Scientology's "E-meter," its lie detector.

47. In this recent period of spiritual battle God brought to me a teaching by Jesus, recorded at Matthew 12:31,32 and Mark 3:28,29, which I see as the key to why He chose me for His Cause. Jesus states in Mark:

> "28 Verily I say unto you. All sins shall be

> forgiven unto the sons of men, and blasphemies wherewith soever they shall blaspheme:
>
> 29 But he that shall blaspheme against the Holy Ghost hath never forgiveness, but is in danger of eternal damnation."

When in his "theology" Hubbard asserts that Christ and God are "implants," he blasphemes the Holy Spirit, the one unforgivable sin. People drawn into Scientology and brought to adopt this blasphemy are in grave spiritual danger.

48. In this latter period, it also became clear to me that my experiences in Scientology, which I now see as religious, indeed sacred, because they were created and motivated by God for His Glory, are also religious by Scientology's own pronouncements. In either case, under our Constitution, Scientology cannot use the courts to silence me about those religious experiences. What Scientology is seeking to have the courts order in its pending motions for summary adjudication is in violation of and barred by both the Establishment and Free Exercise Clauses of the First Amendment. Scientology claims to be a religion, and organized exclusively for religious purposes. Scientology claims that all of its policies, directives and writings of all kinds on the subject, its organization and practices are "religious scriptures." Scientology claims that its Sea Organization, members of which sign a billion year contract, is a "religious order." I was in the Sea Org from 1971 through 1981, the period of almost all of my significant experiences about which Scientology seeks to silence me.

49. What if I had been, instead of a Scientologist, a member of a Christian church; had been declared by the "church" leaders

"fair game;" had been the target a public campaign by the church to assassinate my reputation; had been assaulted by private investigators hired by the "church's" board of directors; had been the target of an attempt to involve me in a highway "accident;" had been spied on and harassed for weeks on end by these private investigators; had had the contents and substance of my "confessions" or pastoral counseling divulged publicly and used against me; had been sued by the "church;" had been subjected to false criminal charges and attempts to have me jailed; had been entrapped by "church" officials; and had been secretly and illegally videotaped by "church" agents; and so forth? All of the acts listed in the preceding sentence were carried out by Scientology against me and formed the basis of my cross-complaint. What if I had cross-complained against the "Christian church" and its "leaders" for the emotional distress resulting from these torts and abuses? Is it conceivable that, as a condition of settlement of the lawsuit against the Christian church, it or its leaders could demand silence about my religious experiences, about Christ, Christianity, God, and Christianity's Scriptures, the Holy Bible? Is it conceivable that a court could compel me to pay $50,000 each time I thereafter said anything about my religion, my religious experiences, Christ, Christianity, the Bible or God? Is it conceivable that a court in this country could order me jailed if I communicated about these Things? Is it conceivable that I could not even discuss with other Christians their experiences of Christianity; and is it conceivable that I could be compelled to pay $50,000 and jailed for each time I discussed the experiences of other Christians with them? Is it conceivable that in the face of continuing attacks by the Christian "church" leaders after the "settlement" I must still remain silent about my "religion" and his "religious experiences?"

50. No Christian church would consider imposing such conditions in a "settlement." No court would consider enforcing such conditions against a Christian. Why then do courts enforce such conditions at the insistence of Scientology against people it has abused? The answer is that our courts are often deceived, confused and blinded by evil, and as a result give evil favorable, special treatment; and to the detriment of goodness and justice. Only an organization or individual of such an evil and malevolent nature that they cry out to be brought to the light of truth would consider using our justice system to keep that nature hidden.

51. As Christ taught, and as a child of God, my practice is forgiveness. As all that I have done has by Christ been forgiven, I have forgiven everything anyone has ever done to me, every act or thought of persecution. What I cannot forgive, however, for I have not the power to forgive it, is Hubbard's, Scientology's leaders' Scientologist's and anyone else's blasphemy of God's Holy Spirit.

52. I believe, moreover, that Scientologists will not recognize their need for forgiveness as long as they blaspheme the Holy Spirit, and they will persecute me as long as they commit and promote this blasphemy; so I ask them to stop. I ask as well that they not persecute the little ones, those who are the least among us, those whom Scientology's leaders call "suppressive persons," "PTSes" or "degraded beings," for in that persecution they persecute Christ Himself. I know that God for His Purposes chose me to be persecuted; and to care and hurt when the little ones are persecuted. I care, then, what Scientology does to me, for it is

doing it and will do it to anyone else. It is to all of these, and to all those in Scientology, that God has sent me. I believe that we are in the end times, and that God has sent His messengers, teachers and prophets onto His Elect, wherever they are, in whatever country, city, prison, church or cult, to gather them onto Himself. As stated by the Apostle at I. John 2:22:

> "Who is a liar but he that denieth that Jesus is Christ? He is antichrist, that denieth the Father and the Son."

In the end times it is expected that antichrist would use man's laws and courts to enforce his evil contracts by which he would bind, torment and destroy God's sons. God chose me to be persecuted by Scientology's leaders, using their organization's tax-exempt millions, and in violation of the nation's Constitution, as Apostles of old were persecuted, and all God's Disciples have been persecuted throughout history. This need not be, for persecution can end in no time and without downside. Nevertheless, God allows and uses the persecution of His Children, His Messengers, Teachers and Prophets to prove His great Mercy and Love and the power of His marvelous plan of salvation, both for the persecutors and those persecuted. God knows which souls He will reach through my words, story and persecution. They may be few; nevertheless, He desires that all should be saved.

53. All that I have done in all my life is for this moment in God's Plan. I ask for mercy if that be God's Will.

/

/

/

/

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at San Anselmo, California, on September 15, 1995

GERALD ARMSTRONG

DECLARATION OF GERALD ARMSTRONG

I, Gerald Armstrong, declare:

1. I am the defendant in the case of Church of Scientology of California v. Gerald Armstrong, Los Angeles Superior Court No C 420153. Attached hereto as Exhibit A is a copy of the Armstrong decision rendered by Judge Paul G. Breckenridge Jr. on June 20, 1984. A cross-complaint I filed against plaintiff Scientology organization and other Scientology organizations, hereinafter referred to as "the organization," was bifurcated from the underlying case on motion of the organization and did not go to trial as it settled on December 11, 1986. The settlement agreement included delivery of certain documents from the underlying case to the organization and allowed the organization to maintain its appeal from the Armstrong decision then pending in the California Court of Appeal, Second Appellate Division as No. B005912. On December 18, 1986 the Court of Appeal, whose decision is attached hereto as Exhibit B, dismissed the organization's appeal, reasoning that there would be no appealable final judgment until after trial of the cross-complaint.

2. On October 11, 1989 I was served at my home with a subpoena duces tecum, a copy of which is attached hereto as Exhibit C, in the case of Bent Corydon v. Church of Scientology International, Los Angeles Superior Court No. C 694401. The subpoena, issued by Toby Plevin, attorney for Mr. Corydon, orders my appearance to testify at a deposition and to produce the agreements, releases and any other documents relating to the settlement I had entered into with the organization.

3. Within a few days of service Ms. Plevin telephoned to confirm that the deposition venue was acceptable to me, to advise me that the

October 20 deposition date would probably be changed, and to ask me for alternative dates which would be convenient for me. We spoke two or three times by telephone over the next week or so to set or cancel dates. During one of our conversations she informed me that she had received "a threatening letter" concerning my deposition from attorney Larry Heller, who I knew to be an attorney of record for various Scientology-related organizations and individuals, and to have a supervisory role in virtually all the organization's legal matters. Ms. Plevin read me parts of Mr. Heller's letter in which he stated that it was inconceivable that I had any information relevant to Mr. Corydon's lawsuit, that Ms. Plevin was seeking to breach the settlement agreement by proceeding with my deposition, and that should my deposition ever go forward he would apply to the court for sanctions. It became apparent to me during this conversation with Ms. Plevin that I was very important to both sides in the Corydon litigation and that I was again intensely involved with the organization and could not avoid involvement.

4. On October 23 I received a telephone call from Mr. Heller. He stated that his client would seek a protective order to prevent the deposition from going forward but that it probably would anyway. He asked if I would have an attorney at the deposition, and I said that Michael Flynn (who had represented me in Armstrong) did not wish to be involved, that so far I did not have another attorney for the deposition, and that it was likely I would not. Mr. Heller then offered to have his client pay for an attorney for me to be present at the deposition. I asked if it could be an attorney of my choice, and he said that he didn't see any problem but would need to ensure that the attorney would do what his client wanted. He said that to maintain the settlement agreement I could only answer questions by court order, that I should refuse to answer the deposition questions and force Mr. Corydon to

get an order from the court compelling me to answer. I said I would have to think about the problem and get some advice. Mr. Heller gave me his phone numbers and asked me to call him back within two days.

5. Following my conversation with Mr. Heller I called my attorney Michael Flynn who had negotiated the settlement of my lawsuit and similar settlements on the same date for several other individuals. I informed him of Mr. Heller's offer and he said that Mr. Heller had called him earlier and offered to pay him to attend my deposition to prevent my testifying. Mr. Flynn said that he had refused the offer and reiterated that he did not wish to be involved in any way in Scientology-related litigation. I confirmed with him that nothing in the settlement agreement proscribed my obtaining assistance or advice from anyone currently involved in litigation against the organization.

6. I then called Ms. Plevin, told her of the organization's offer to pay for an attorney for me at the deposition, and asked her if she and Mr. Corydon could match the offer. She said that she is a sole practitioner, that she and Mr. Corydon are keeping the lawsuit going on a shoestring, and that they could not pay for my attorney. She said, moreover, that even if she and Mr. Corydon could afford it they would not pay for an attorney for me because it would be unethical.

7. On October 25 I called Mr. Heller to tell him I considered it inappropriate for the organization to pay for an attorney for me. He said he had a problem with me responding to deposition questions concerning such things as L. Ron Hubbard's misrepresentations or my period as Mr. Hubbard's archivist in the organization. He said he wanted to have an attorney present to instruct me not to answer such questions so that Mr. Corydon would have to move to compel an answer. He said that if the court

ordered sanctions for my refusal to answer his client would indemnify me. He said I had a contractual obligation to the organization, which it had paid a lot of money for, not to divulge confidential information, and that if I answered I would have breached the settlement agreement and may get sued. He said he recognized that I was in the middle and that my safest position was to refuse to answer, make Mr. Corydon bring a motion to compel and let the court be the final arbiter.

8. This and other threats, other events and circumstances following the settlement, and my present level of importance to and involvement with the organization have impelled me to write this declaration. It is my opinion that some of the settlement conditions are unenforceable, that the organization is attempting to enforce them in a manner which is inconsistent with the spirit of settlement, and that these conditions and their attempted enforcement consititute an on-going obstruction of justice and violation of my and others' First Amendment rights. The purpose of this declaration is to make known this situation, to demonstrate certain conditions' unenforceability, and to support an action to have them so adjudged by the court with jurisdiction to enforce the terms of the settlement agreement. I am also providing this declaration to parties and lawyers involved in the correction of legal abuses.

9. On November 1, 1989 Mr. Heller, on behalf of Author Services, Inc. (ASI), a defendant in Corydon, filed a motion "to Delay or Prevent the Taking of Certain Third Party Depositions," a copy of which is attached hereto as Exhibit D. At page 4 Mr. Heller states:

"One of the key ingredients to completing these settlements, insisted upon by all parties involved, was strict confidentiality respecting: (1) the Scientology parishioner or staff member's experiences within the

Church of Scientology; (2) any knowledge possessed by the Scientology entities concerning those staff members or parishioners; and (3) the terms and conditions of the settlements themselves."

10. The complete text of the settlement ingredient Mr. Heller has capsulized, paragraph 7D, reads:

"Plaintiff agrees never to create or publish or attempt to publish, and/or assist another to create for publication by means of magazine, article, book or other similar form, any writing or to broadcast or to assist another to create, write, film or video tape or audio tape any show, program or movie, or to grant interviews or discuss with others, concerning their experiences with the Church of Scientology, or concerning their personal or indirectly acquired knowledge or information concerning the Church of Scientology, L. Ron Hubbard or any of the organizations, individuals and entities listed in Paragraph 1 above. Plaintiff further agrees that he will maintain strict confidentiality and silence with respect to his experiences with the Church of Scientology and any knowledge or information he may have concerning the Church of Scientology, L. Ron Hubbard, or any of the organizations, individuals and entities listed in Paragraph 1 above. Plaintiff expressly understands that the non-disclosure provisions of this subparagraph shall apply inter alia, but not be limited, to the contents or substance of his complaint on file in the action referred to in Paragraph 1 hereinabove or any documents as defined in Appendix "A" to this Agreement, including but not limited to any tapes, films, photographs, recastings, variations or copies of any such materials which concern or relate to the religion of Scientology, L. Ron Hubbard, or any of the organizations, individuals, or entities listed in Paragraph 1 above. The attorneys for Plaintiff, subject to the ethical limitations restraining them as promulgated by the state or federal regulatory associations or agencies, agree not to disclose any of the terms and conditions of the settlement negotiations, amount of the settlement, or statements made by either party during settlement conferences. Plaintiff agrees that if the terms of this paragraph are breached by him, that CSI and the other Releasees would be entitled to $50,000 for each such breach. All monies received to induce or in payment for a breach of this Agreement, or any part thereof, shall be held in a constructive trust pending the outcome of any litigation over said breach. The amount of liquidated damages herein is an estimate of the damages that each party would suffer in the event this Agreement is breached. The reasonableness of the amount of such damages are hereto acknowledged by Plaintiff."

11. It is my opinion that the conditions of this paragraph are unenforceable for two reasons: a. the organization's actions since the settlement have rendered them invalid; b. they are so broad and at the same time so restrictive that, even if the organization had not acted to invalidate them, they deny me, on their face, several inalienable rights and are therefore against public policy.

12. Paragraph 7B of the December 1986 settlement agreement reads in part:

"Plaintiff understands that by the execution of this release no further claims arising out of his experience with, or actions by, the Releasees, from the beginning of time to and including the date hereof, which may now exist or which may exist in the future may ever be asserted by him or on his behalf, against the Releasees."

13. Paragraph 8 of the December 1986 settlement agreement reads:

"Plaintiff further agrees that he waives and relinquishes any right or claim arising out of the conduct of any defendant in this case to date, including any of the organizations, individuals or entities as set forth in Paragraph 1 above, and the named defendants waive and relinquish any right or claim arising out of the conduct of Plaintiff to date."

14. I am including these two paragraphs because they contain what to me is essential in the settlement agreement, and they show that my rights arising out of the conduct of the organization following the settlement are not waived or relinquished.

15. Sometime in the fall of 1987 I received a copy of a document, pages 11, 12, 18 and 29 from which are attached hereto as Exhibit E, created and circulated by the organization to discredit Bent Corydon who had written a book entitled L. Ron Hubbard, Messiah or Madman? which had been published in August that year. Mr. Corydon had interviewed me several months before the settlement and had used some of my statements from the interview, my trial testimony in Armstrong, and from declarations I had written during the pre-settlement litigation in his book.

16. At page 29 of their retort the organization states:

"Corydon has used a description of the RPF provided by Gerry Armstrong, among others. Armstrong's description in this book,however, is completely contrary to his own previous sworn affidavit about the RPF.

"Gerry Armstrong's description of the RPF in Corydon's book can also be viewed in light of Armstrong's numerous false claims and lies on other subject matters. See chapter on Corydon as an "author" for further information on Gerry Armstrong's incompetence as a researcher."

17. The chapter on Mr. Corydon as author contains the statement at page 12:

"Gerry Armstrong, another one of Corydon's main sources in the book, claims that L. Ron Hubbard " ... did not spend several years throughout Asia," and that Mr. Hubbard's total time in Asia was "a few weeks."

L. Ron Hubbard, in fact, was in Asia and the Orient several times during a three-year period , during which his travels were quite extensive."

These paragraphs concern my experiences in the organization as Mr. Hubbard's archivist and biographical researcher and my knowledge of Mr. Hubbard's history, and I consider that I have a right to reply.

18. The organization states at page 18 of its retort:

"Homer [Schomer] had testified in 1984 in a court case brought by the Church of Scientology against Gerald Armstrong (a former staff member who had stolen valuable documents from Church archives).

In the Christofferson case, Schomer admitted to having committed perjury in the previous Armstrong case."

I believe the organization is in violation of the settlement agreement by discussing the Armstrong case.

19. The organization states at page 11 of its retort:

"Corydon goes on to say that tens of millions of dollars paid for services delivered to Church members at the Flag organization were channeled into Hubbard's personal accounts.

There is no documentation to support this statement by Corydon. In fact, his claims are based on nothing more than hearsay, rumor and lies gathered from a small cabal of thieves, perjurers and disreputable sources."

While working on a project for Mr. Hubbard I acquired the knowledge that millions of dollars of organization money had been channeled into his accounts, I wrote a number of declarations containing this information after leaving the organization, and I know the other individuals who had this and similar knowledge and who were Mr. Corydon's sources for his statement. To denominate us "a small cabal of thieves, perjurers and disreputable sources" I believe is scandalous.

20. On October 7, 1987 I received a call from Michael Flynn who relayed to me a message from Earle C. Cooley, one of the organization's principal attorneys, concerning the then proceeding trial in London, England of a lawsuit the organization had brought against a writer, Russell Miller. Mr. Miller had interviewed me in Boston, Massachusetts in 1986, some months before the December settlement, for a biography of L. Ron Hubbard. According to Mr. Flynn, Mr. Cooley stated that it had been disclosed during the trial that Mr. Miller possessed documents in violation of sealing orders in Armstrong, and he threatened that if I talked to any of the attorneys or parties involved in the trial the organization would view it as a breach of the settlement agreement.

21. In early 1988 I received copies of various documents, attached hereto as Exhibits F to K, from the case of Church of Scientology of California v. Russell Miller & Penguin Books Limited in the High Court of Justice, Case No. 6140. The organization had unsuccessfully sought pre-publication suppression of Mr. Miller's book, which he titled Bare-Faced Messiah, and it was published and distributed immediately following the October 1987 trial.

22. Attached hereto as Exhibit F is a copy of an affidavit of Kenneth David Long dated October 5, 1987, and the exhibits or partial exhibits thereto that so far I have in my possession. The purpose of Mr. Long's affidavit, as it relates to me, was to try to convince the English Court that I had provided documents to Mr. Miller in violation of various California Courts' sealing orders.

23. In pages 3 through 8 Mr. Long gives the organization's version of my job description and actions as Mr. Hubbard's biography researcher and archivist, the contracting of Omar V. Garrison to write the biography, and the procedural history in Armstrong from the filing of the complaint up to the settlement. At page 9 Mr. Long states that "following the trial the Church sought and obtained a series of sealing orders which effectively maintained the sealing of the trial exhibits right up to and including December 1986." He then identifies a number of documents Mr. Miller had quoted from in Bare-Faced Messiah: Mr. Hubbard's Boy Scout Diary, a letter to Mr. Hubbard from his mother, a letter from Mr. Hubbard to his first wife, Polly, a letter to the Cape Cod Instrument Company, a journal Mr. Hubbard kept while in the navy, three diaries from 1927 to 1929, and Mr. Hubbard's "Tentative Constitution for Rhodesia." Mr. Long also states that each of these documents "has never been unsealed or made available to the general public."

24. At page 13 of his affidavit Mr. Long, without providing any further elucidation, states, "I also know that Mr. Armstrong refused to obey an order of the court, and retained possession of documents which he had been ordered to surrender to the court for safekeeping under seal." He then concludes that "it is my belief that the documents quoted and paraphrased in Mr. Miller's manuscript were furnished to Mr. Miller by Mr. Armstrong, and that they could not have been furnished to Mr. Miller by anyone else as no one else other than Mr. Armstrong had access to these documents."

25. The exhibits Mr. Long identified and appended to his affidavit included the following:

a. A copy of my W-2 Wage and Tax Statements for 1977 and 1978. This document, which I have attached to Mr. Long's affidavit, shows the court's exhibit sticker indicating it was admitted into evidence in Armstrong.

b. A copy of an affidavit I executed on April 12, 1980 while in the organization. This document, the first page of which I have attached to Mr. Long's affidavit, was also admitted into evidence in Armstrong.

c. A copy of my petition to Mr. Hubbard to assemble his archives for a biography. This document, which is presently unavailable to me, was admitted into evidence in Armstrong.

d. A non-disclosure and release bond executed by me on March 18, 1977. This document, the first page of which I have attached to Mr. Long's affidavit, shows the court's exhibit sticker indicating it was admitted into evidence in Armstrong.

e. A copy of my dispatch of February 22, 1980. This document, which is presently unavailable to me was admitted into evidence in Armstrong.

f. A copy of my dispatch of May 14, 1980. This document, which is presently unavailable to me, was admitted into evidence in Armstrong.

g. A copy of the agreement dated October 30, 1980 between Omar Garrison and AOSH DK Publications. This document, which is presently unavailable to me, was admitted into evidence in Armstrong.

h. A copy of a letter of November 14, 1980 from AOSH DK Publications regarding the Hubbard biography project. This document, which is presently unavailable to me, was admitted into evidence in Armstrong.

i. A copy of a resolution adopted by the organization's board of directors providing an assistant to Mr. Garrison. This document, which is presently unavailable to me, was admitted into evidence in Armstrong.

j. A copy of my letter of December 12, 1981 resigning from my position as Mr. Hubbard's researcher. This document, which is presently unavailable to me, was admitted into evidence in Armstrong.

k. A copy of pages 313 to 323 of my deposition testimony of August 1, 1986 in the case of Michael J. Flynn v. Church of Scientology International in the US District Court Central District of California, Case No. CV8504853R. I have attached these pages as an exhibit to Mr. Long's affidavit herewith.

26. Attached hereto as Exhibit G is a copy of a second affidavit of Mr. Long dated October 5, 1987 which was filed in the Miller case. In pages 2 through 16 of this affidavit Mr. Long again reviews the Armstrong litigation, expands his analysis of the case's various sealing orders, and again designates several documents he claims I gave Mr. Miller in contravention of those orders.

27. At page 9 of his affidavit Mr. Long identifies three diaries written by Mr. Hubbard between 1927 and 1929 and charges that Mr. Miller or Jonathan Caven-Atack, who had assisted Miller with his research, possessed them in violation of a sealing order in Armstrong. Mr. Long goes on to state at page 10: "I am certain that the only possible source for the diaries attached by Mr. Caven-Atack as Exhibit JC-A4 is Mr. Armstrong and/or his counsel."

28. In pages 11 to 15 of his affidavit Mr. Long describes a letter to Mr. Hubbard from his mother, Mr. Hubbard's Boy Scout diary, and a letter from Mr. Hubbard to his first wife, Polly, and alleges that Mr. Miller or Mr. Caven-Atack obtained these documents from me in violation of the Court's sealing orders.

29. At page 16 Mr. Long describes three letters from Mr. Hubbard to Helen O'Brien and goes on to state: "All three of these letters were surrendered to the Clerk of the Court by Mr. Armstrong and his counsel in September 1982, and all remained under seal until they were returned to the Church in December 1986. Mr. Miller's inclusion of the information cited herein clearly shows additional breaches of confidence and violation of the orders issued by the California courts."

30. I consider that Mr. Long's assertions of what documents were sealed, when they were sealed and where they originated are erroneous, and his conclusion that I had violated the Los Angeles Superior Court's sealing orders fallacious.

31. Attached hereto as Exhibit H is a copy of a third affidavit of Mr. Long dated October 5, 1987 and filed in the Miller case. At page 4 Mr. Long repeats his accusation that "the evidence is irrefutable that the great majority of these biographical documents were obtained by Mr. Caven-Atack and Mr. Miller in violation of court sealing orders." And he states: "Gerald Armstrong has been an admitted agent provocateur of the U.S. Federal Government who planned to plant forged documents in Church files which would then be "found" by Federal officials in subsequent investigation as evidence of criminal activity."

32. Attached hereto as Exhibit I is a copy of pages 1 and 4 of an affidavit of Sheila MacDonald Chaleff dated October 5, 1987 which was filed in Miller. I do not at present have pages 2 and 3. Ms. Chaleff, whom I do not know, states at page 4: "Mr. Armstrong is known to me to be a US government informant who has admitted on video tape that he intended to plant forged documents within the Church of Scientology and then using the

contents to get the Church raided where these forged documents would be found and used against the Church."

33. Attached hereto as Exhibit J is a copy of an affidavit of Mr. Long dated October 7, 1987 and filed in Miller. The copy I have is missing a page at paragraphs 4 to 7. At paragraph 2 Mr. Long describes his responsibilities:

"I have been deeply involved in the litigation of (Armstrong) since the inception of that litigation on August 2, 1982. During the course of my participation in that litigation, I personally inventoried the materials surrendered pursuant to court order to the Clerk of the Los Angeles Superior Court in September 1982 by Gerald Armstrong and his counsel. I also attended almost every deposition and/or pre-trial proceeding held in that case, and was present as an assistent to counsel throughout each day of the trials proceedings in May and June, 1984." At paragraph 7 Mr. Long concludes: "There is no legal way that Mr. Armstrong, Mr. Miller and/or Mr. Newman could have possession of these materials."

34. At paragraph 9 Mr. Long identifies a document he has written entitled "A Chronological History of Major Armstrong Case Orders," and at paragraph 10 he describes the security operation he and a staff maintained throughout the life of the Armstrong documents as their fate was decided by various courts:

"...I maintained, along with my staff, a daily check with each court in which a temporary stay order was pending in order to ensure that I learned the minute a ruling was issued. So before the trial court received any order vacating a sealing order, the Church obtained another order sealing them up again. In actuality, it took 3-5 days for the trial court to receive a vacating order from the Higher Court and before rescript I would personally hand deliver a new stay order. In addition, I also had my staff maintain a watch over the area of the court where these documents were kept during each so called "window" period and no one viewed and/or copied the materials." Mr. Long concludes that"(t)here can be no doubt that the documents in issue herein, no matter through whom they were funneled to Mr. Miller, originated from Mr. Armstrong, in violation of court orders."

35. At paragraph 15 Mr. Long argues the matter of the Helen O'Brien letters:

"Gerald Armstrong was the only person that had these letters and he knowingly violated several court orders -- the August 24, 1982 court order to turn in all materials to the court and the June 20, 1984 court order sealing the documents. He obviously didn't keep them sealed since Mr. Newman and Mr. Miller have copies and he didn't turn in all copies of the letters when ordered, since as a condition of settlement Mr. Armstrong turned in any materials he had concerning LRH or the Church. I personally inspected the documents he turned in in January 1987 and among them were the three Helen O'Brien letters, letters that he was ordered to turn into the court."

36. The text of the settlement agreement relating to documents, Paragraphs 7E and 7L, reads:

"E. With exception to the items specified in Paragraph 7L, Plaintiff agrees to return to the Church of Scientology International at the time of the consummation of this Agreement, all materials in his possession, custody or control (or within the possession, custody or control of his attorney, as well as third parties who are in possession of the described documents), of any nature, including originals and all copies or summaries of documents defined in Appendix "A" to this Agreement, including but not limited to any tapes, computer disks, films, photographs, recastings, variations or copies of any such materials which concern or relate to the religion of Scientology, L. Ron Hubbard or any of the organizations, individuals or entities listed in Paragraph 1 above, all evidence of any nature, including evidence obtained from the named defendants through discovery, acquired for the purposes of this lawsuit or any lawsuit, or acquired for any other purpose concerning any Church of Scientology, any financial or administrative materials concerning any Church of Scientology, and any materials relating personally to L. Ron Hubbard, his family or his estate. In addition to the documents and other items to be returned to the Church of Scientology International listed above and in Appendix "A", Plaintiff agrees to return the following:

(a) All originals and copies of the manuscript for the work "Excalibur" written by L. Ron Hubbard;

(b) All originals and copies of documents commonly known as the "Affirmations" written by L. Ron Hubbard; and

(c) All documents and other items surrendered to the Court by Plaintiff and his attorneys pursuant to Judge Cole's orders of August 24, 1982 and September 4, 1982 and all documents and other items taken by the Plaintiff from either the Church of Scientology or Omar Garrison. This includes all documents and other items entered into evidence or marked for identification in Church of Scientology of California v. Gerald Armstrong, Case No. C 420 153. Plaintiff and his attorney will execute a Joint Stipulation or such other documents as are necessary to obtain these documents from the Court. In the event any documents or other items are no longer in the custody or control of the Los Angeles Superior Court, Plaintiff and his counsel will assist the Church in recovering these documents as quickly as possible.

including but not limited to those tapes and other documents now in the possession of the United States District Court in the case of United States v. Zolin, Case No. CV 85-0440-HLH(Tx), presently in the Ninth Circuit Court of Appeals. In the event any of these documents are currently lodged with the Court of Appeal, Plaintiff and his attorneys will cooperate in recovering those documents as soon as the Court of Appeal issues a decision on the pending appeal."

L. Notwithstanding the provisions of Paragraph 7(E) above, Plaintiff shall be entitled to retain any artwork created by him which concerns or relates to the religion of Scientology, L. Ron Hubbard or any of the organizations, individuals or entities listed in Paragraph 1 above provided that such artwork never be disclosed either directly or indirectly, to anyone. In the event of a disclosure in breach of this Paragraph 7(L), Plaintiff shall be subject to the liquidated damages and constructive trust provisions of Paragraph 7(D) for each such breach."

37. I believe the provisions of Paragraphs 7E and 7L are unenforceable because the organization has itself violated the intent of the settlement agreement by acting improperly with the documents entrusted to it, by its own violations of sealing orders, and by its failure to deliver to me my documents in reciprocity.

38. Attached hereto as Exhibit K is a copy of an affidavit of Mr. Long dated October 8, 1987 and filed in Miller. Mr. Long responds to explanations in additional affidavits of Mr. Miller and Mr. Caven-Atack concerning sources and routes for their Hubbard documents. Mr. Long concludes again that "there is no doubt that the documents in question in the suit were improperly obtained in violation of Court Orders and in Breach of Confidence." He also quotes in his affidavit from the transcript of a hearing

of April 23, 1984 in Armstrong, a declaration of Michael Flynn from "another church case," and a comment of my lawyer Julia Dragojevic at a deposition of Homer Schomer.

39. Mr. Long also identifies, produces and quotes from an affidavit of mine dated March 7, 1986, a copy of which I have attached hereto as Exhibit L. This affidavit was filed in Tonja Burden v. Church of Scientology of California, et al. U.S. District Court, Middle District of Florida, Tampa Division, Case No. 80-501-Civ-T-17. The organization settled this case in 1986 and had the case file sealed.

40. On December 21, 1988 I received a call from Michael Flynn who relayed a message from Michael Lee Hertzberg, one of the organization's leading lawyers. Paul Morantz, Bent Corydon's attorney in one or another case, filed a motion to unseal the Armstrong court file. Judge Geernaert, who had inherited the Armstrong file after Judge Breckenridge retired, allowed the unsealing. The organization had 30 days to appeal. They wanted me to file a pleading to keep the court file sealed. They said that otherwise the "pig document" would come out. (This document, which was specifically sealed by Judge Breckenridge, was a recitation of a dream I had in 1985.) They also stated that if I didn't file something it would unsettle the settlement. They said they have a case on point. They said it would be bad for me. I could have to give the (settlement) money back. Mr. Flynn translated the facts to me: "It's a veiled threat." I said my decision at that time was to do nothing.

41. On December 22, 1988 Mr. Flynn called to tell me he had received the organization's petition for a writ of supersedeas. He said the case Mr. Hertzberg had been citing regarding unsettling the settlement involved a doctor who molested a minor patient. As part of the settlement

the file was sealed. Mr. Flynn said he was unsure how the case applies to what the organization wanted me to do. He said the court didn't get to the point of dealing with unsettling the settlement. I said I would still do nothing.

42. On December 27, 1988 I again spoke by telephone with Mr. Flynn who had himself spoken to lawyers on both sides of Mr. Corydon's litigation. This is what I considered relevant at the time: Following Judge Geernaert's unsealing of the Armstrong court file, the organization filed a petition for a writ of supersedeas claiming the sealing of the file was consideration for settlement. In his response Paul Morantz filed some settlement documents, a notary seal from the State of Pennsylvania on which identified Bill Franks, like me a former organization executive and witness in various organization-related cases, as their source. Mr. Franks had sent the documents to a lawyer to look at and the lawyer gave them to another lawyer who gave them to Mr. Morantz. The organization reacted. They claimed to have "the smoking gun," the proof of settlement violations. They charged that there are numerous breaches: they knew last summer that Mr. Franks had spent time with the Aznarans (who I understood to be organization executives who had recently defected and had sued the organization); and they had some instance of Homer Schomer doing something three weeks before. Mr. Flynn advised me he was going to file a pleading to say that the settlement documents should remain sealed. I said I felt the court file should be unsealed and almost certainly would be at some point, but that I wouldn't do anything at that time. Around November 15, 1989 I received from Ms. Plevin a copy of a document entitled "Response of Gerald Armstrong to Opposition Filed By Real Party in Interest, Bent Corydon" which is attached hereto as Exhibit M.

43. On November 18, 1989 I received a copy of a videotape of me edited from illegal videotapes made in 1984 by organization operatives and used thereafter against me. This copy had been given to the London Sunday Times, along with a package of documents concerning me which I do not yet have, in late 1987 or early 1988. Taped to the cassette is the business card of Eugene M. Ingram, the organization's private detective who set up the illegal videotaping. A copy of one side of the video cassette showing Mr. Ingram's card is attached hereto as Exhibit N.

44. On November 20, 1989 I received a call from Mr. Heller who said he wanted to talk me into giving the organization a declaration. He said Homer Schomer, who had also been subpoenaed to testify at a deposition in Corydon, had given them a declaration. Mr. Heller said it was very simple and straightforward, just two things: that I'd had either no or minimal contact with Mr. Corydon in the organization; and that subsequent to leaving I had received no information regarding him. Mr. Heller said that my signing a declaration to help ensure the deposition doesn't go forward would be of assistance to the organization and me. He said we would both have hassles if my deposition goes forward. I told Mr. Heller that it would be inappropriate and I couldn't give him the declaration. I said that I know Mr Corydon quite well. Mr. Heller said that the organization and he did not see me as a relevant witness but a way for Corydon's attorneys to leverage a settlement. I said I saw myself as a relevant witness. I said, "From everything I've seen that's going on and everything I've heard that's going on and knowing my history and the issues I cannot see ducking (the deposition) at all. The truthful declaration would be that I would see that my experiences and my knowledge of Bent would be relevant to his case." Mr. Heller said that if I thought I would be helping Bent Corydon by

appearing, I might, but that for sure he would never help me. He said only the organization would ever help me. He stated that I should assist the organization because it had honored its agreement. He said that the organization had signed a non-disclosure agreement as well and as far as he knew had lived up to its agreement. When I paused in answering he said that if there had been any violations he wanted to know and he would rectify the problem. I said, "I think you could check with Ken Long on what has been done regarding Gerald Armstrong subsequent to the settlement. Just get from him everything that's been filed regarding Armstrong, all his declarations regarding me, all the so-called false report corrections that have been put out subsequent to the settlement, any time the so-called "Armstrong Operation" videotape has been used subsequent to the settlement." Mr. Heller reiterated at the end of our conversation that if I start to testify, for example about the Hubbard biography project, or things he and the organization consider irrelevant, they will carefully examine their rights as to what action they will take. He said he strongly suggested that I refuse to answer subject to attorney instruction. He said I had a contractual obligation as far as he could tell.

45. The provisions of the settlement agreement relating to testifying, Paragraphs 7G and 7H, read:

G. Plaintiff agrees that he will not voluntarily assist or cooperate with any person adverse to Scientology in any proceeding against any of the Scientology organizations, individuals, or entities listed in Paragraph 1 above. Plaintiff also agrees that he will not cooperate in any manner with any organization aligned against Scientology.

H. Plaintiff agrees not to testify or otherwise participate in any other judicial, administrative or legislative proceeding adverse to Scientology or any of the Scientology Churches, individuals or entities listed in Paragraph 1 above unless compelled to do so by lawful subpoena or other lawful process. Plaintiff shall not make himself amenable to service of any such subpoena in an manner which invalidates the intent of this provision. Unless required to do so by such subpoena, Plaintiff agrees not to discuss this litigation or his experiences with anyone other than members of his immediate family. As provided hereinafter in Paragraph 18(d), the contents of this Agreement may not be disclosed."

46. It is my opinion that these provisions are unenforceable because the organization is using them in a coercive and obstructive manner, because on their face they deny equal justice to anyone who would engage the organization legally, and because they are suppressive of several basic rights: speech, assembly, safety, happiness.

47. On November 30, 1989 I attended a hearing in Corydon of the organization's motion to prevent my deposition from going forward before Judge Norman Epstein in the Los Angeles Superior Court. Judge Epstein ruled that the deposition would go forward and it is now set for April 12 and 13, 1990.

48. While at the hearing I was served with a subpoena duces tecum, a copy of which is attached hereto as Exhibit O, ordering me to appear as a witness in the trial of Religious Technology Center, et al. v. Joseph Yanney, et al., Los Angeles Superior Court Case No. C690211. The subpoena also orders the production of the settlement agreement. The Yanney trial is at this date proceeding before Judge Raymond Cardenas in department 41.

49. On January 18, 1990 I received from Flynn, Sheridan and Tabb, the law firm which had represented me in Armstrong, a copy of a new appeal, No. B025920, which the organization had filed on December 21, 1989

in Division Three of the Second Appellate District in the California Court of Appeal. In this appeal the organization seeks a reversal of the Breckenridge decision (Exhibit A).

50. On January 30, 1990 I received from Flynn, Sheridan & Tabb the "Reply Brief of Appellants and Response to Cross-Appeal" filed in Division Four of the Second Appellate District in the Court of Appeal in a case entitled Church of Scientology of California and Mary Sue Hubbard, Appellants, against Gerald Armstrong, Defendant; Bent Corydon, Appellee, Civ. No. B038975. In this appeal the organization is seeking a reversal of Judge Geernaert's decision unsealing the Armstrong case file.

51. On February 15, 1990 I received a telephone call from attorney Michael Tabb, a partner of Michael Flynn, who said that he had been called by Larry Heller who told him that the organization considered I had violated the settlement agreement by being in the courthouse to be served in Yanney, that they intended to prove it, and that I would be sued.

52. On February 20, 1990 I executed a document I titled "Respondent's Petition for Permission to File Response and for an Extension of Time to File Response," a copy of which is attached hereto as Exhibit P, and had it mailed to the Court of Appeal. The document was filed in the Armstrong appeal, No. B025920, in Division Three on February 28.

53. On February 21, 1990 I executed a document I titled "Defendant's Petition for Permission to File Response and for Time to File," a copy of which is attached hereto as Exhibit Q, and had it mailed to the Court of Appeal. This document was filed in the Corydon appeal, No. B038975, in Division Four on March 1.

54. At some point the Court of Appeal unsealed the settlement agreement, which I had attached as a sealed exhibit to my two petitions, and which I have attached hereto as Exhibit R.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this fifteenth day of March, 1990 at Oakland, California.

Gerald Armstrong